



ISSB SASB Enhancement

EFRAG comment letter

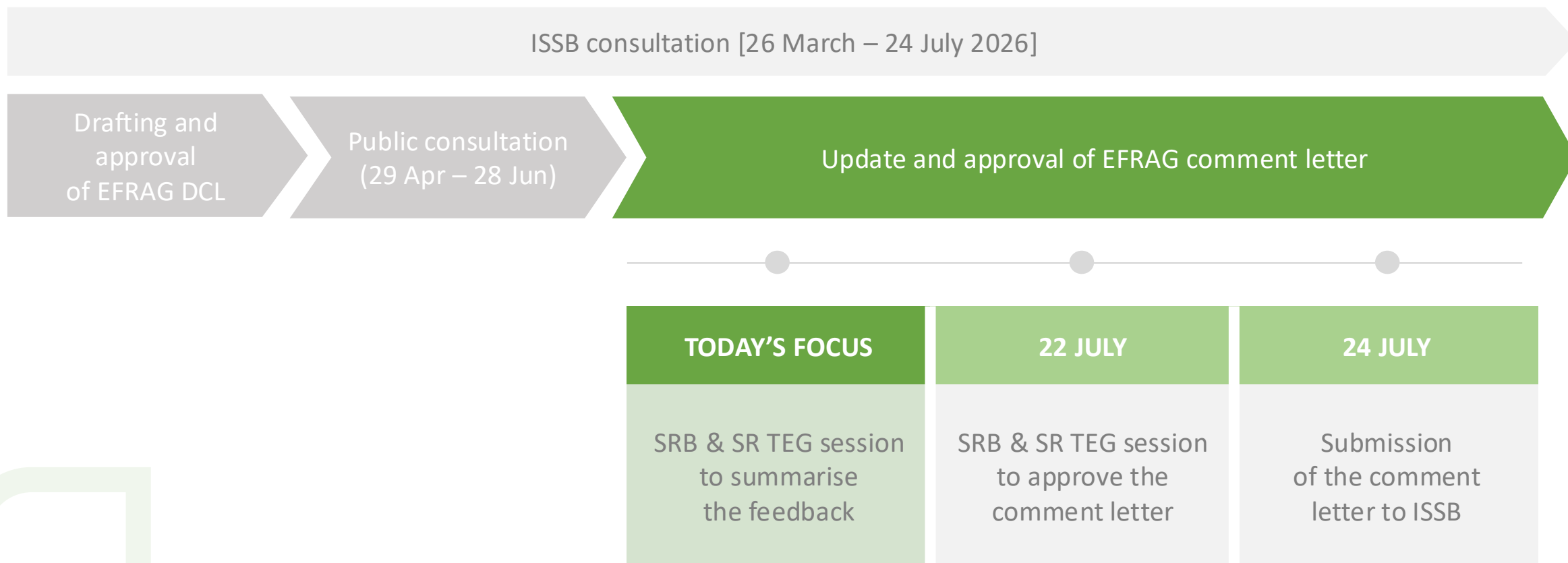
Joint EFRAG SRB & SR TEG meeting, 9 July 2026



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The views expressed in this presentation are those of the presenter, except where indicated otherwise. EFRAG positions, as approved by the EFRAG SRB, are published as comment letters, discussion or position papers, or in any other form considered appropriate in the circumstances.

1.1. Where do we stand



1.2. Session objective

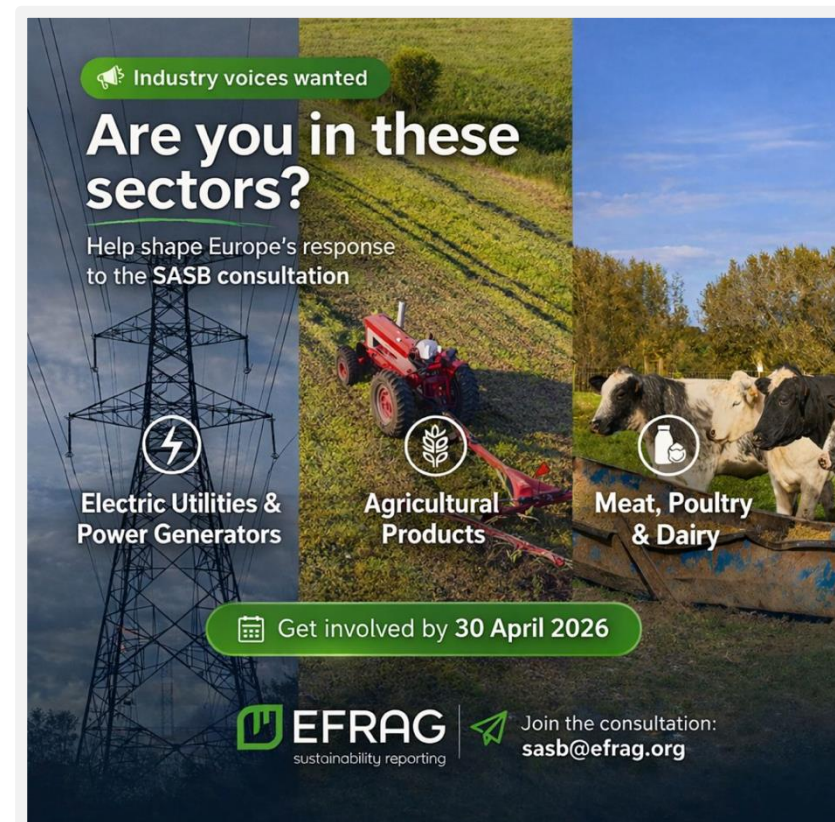
This **information session** aims to:

- present key feedback from the public consultation
- explain how it shaped the updated comment letter
- discuss SRB and SR TEG observations

1.3. Engagement during consultation

Our engagement approach:

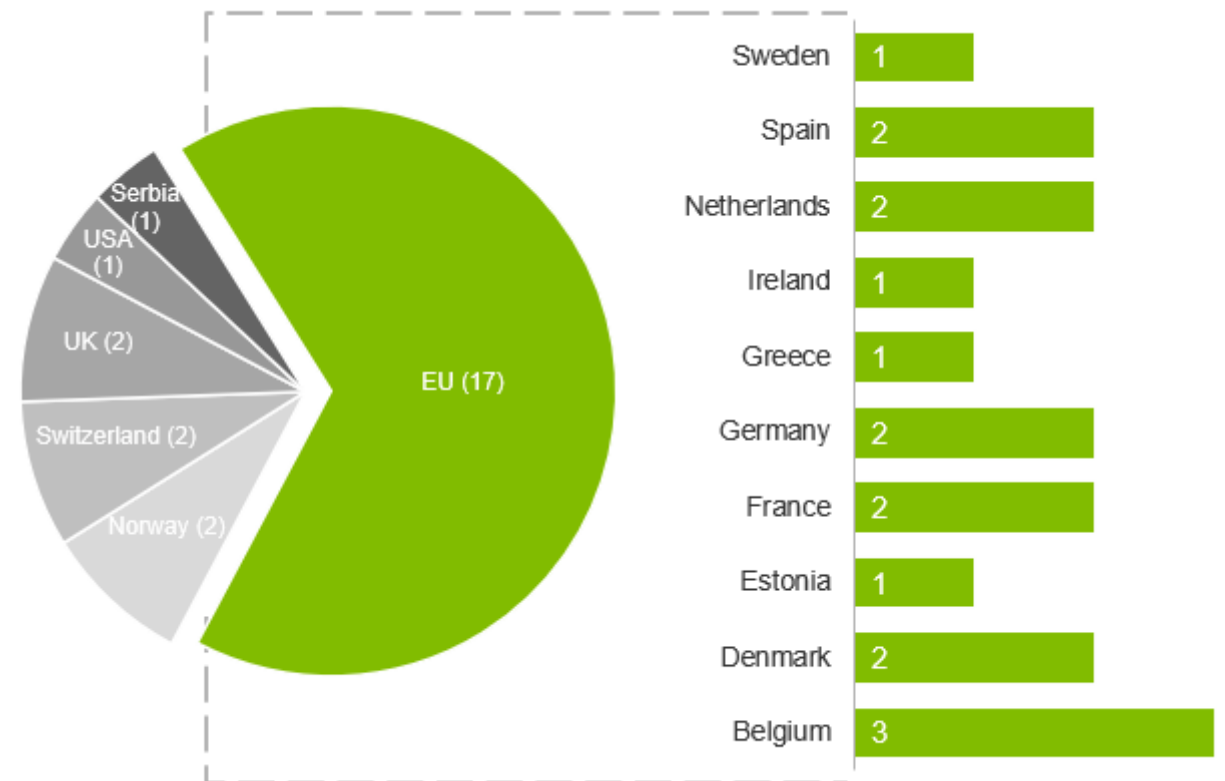
-  website & social media
-  **22 853 emails** sent (high open rate)
-  all EFRAG bodies engaged (incl. CFSS members)
-  Joint workshop with ISSB
-  bilateral meetings



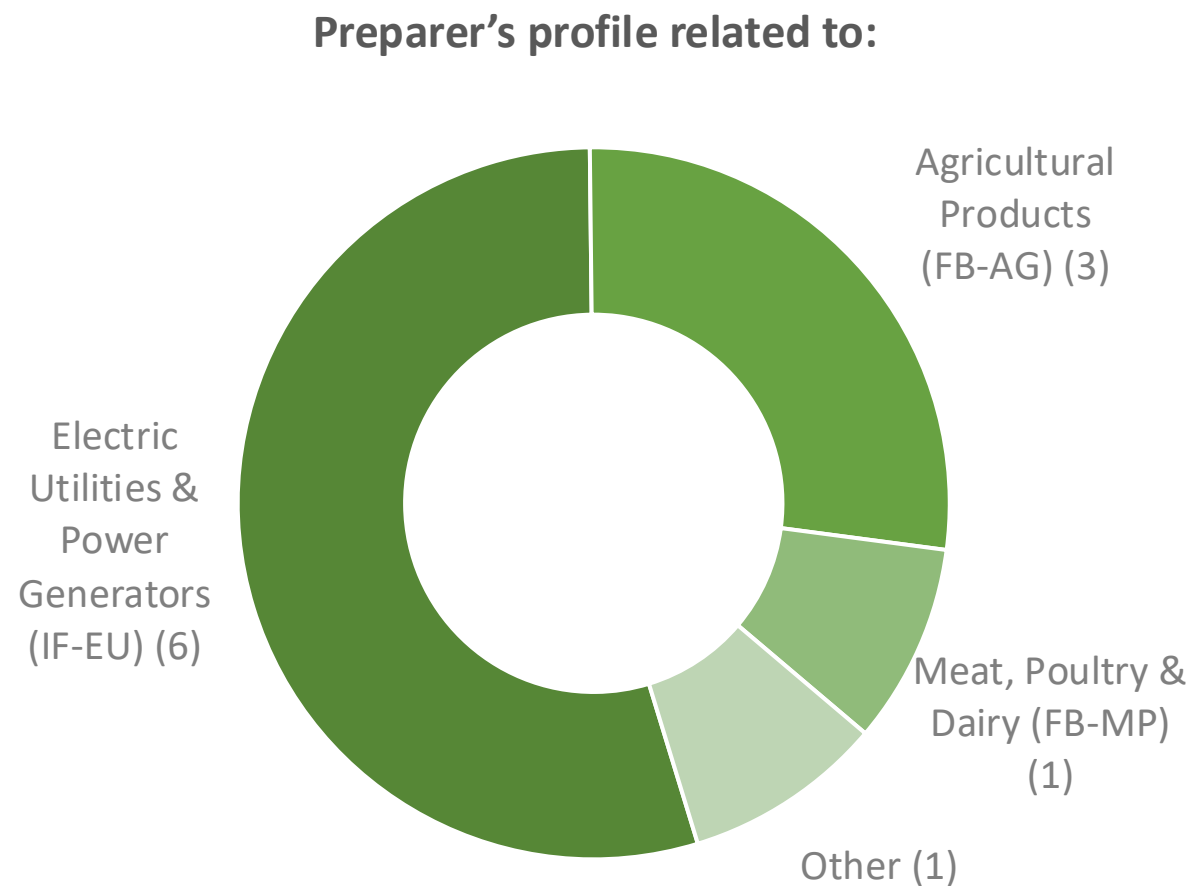
1.4. Stakeholders that contributed

Engagement	Stakeholders
Workshop	15
Bilateral meetings	6
Survey responses	4
Total	25

Geographical distribution: EU vs non-EU breakdown

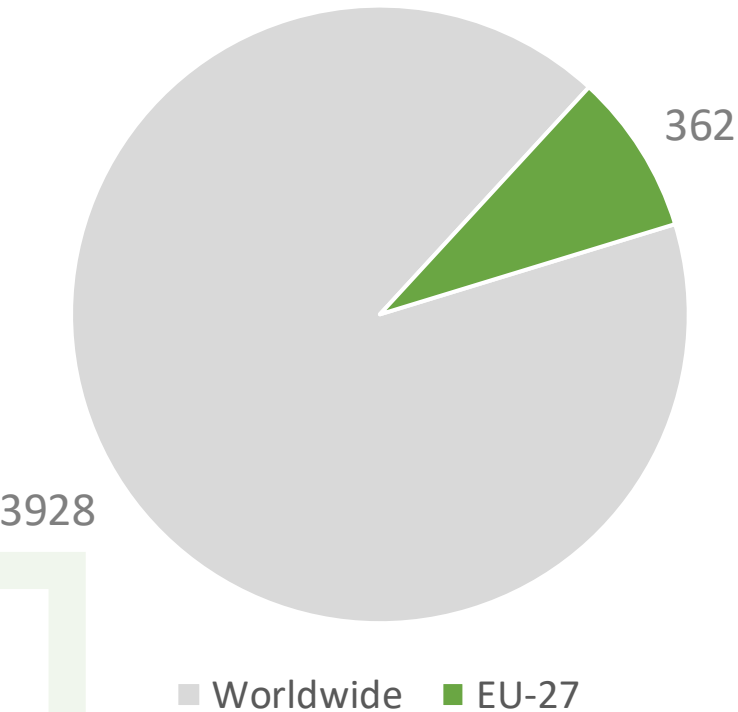


1.5. Stakeholder industries



1.6. Worth noting

EU-27 represents approx. 9% of SASB reporters globally



Breakdown of EU-27	Companies
Electric Utilities & Power Generators (IF-EU)	15
Meat, Poultry & Dairy (FB-MP)	1
Agricultural Products (FB-AG)	0
Other SASB standards	346

Analysis of reporting with SASB Standards based on SASB Navigator, accessed 15 June 2026

1.7. Additional research

Why additional research?

- low uptake of SASB in Europe
- evidence-based approach to identify potential gaps

Sustainability reports analysis

- 38 companies analysed
- focus on selected indicators
- analysis to substantiate the feedback

National standard setters' positions review

- 5 national standard setters (NSS) analysed
- **some NSS refer to EFRAG DCL in their position**



Findings has largely confirmed EFRAG comments

2.1. Environment feedback



Disclosure topics (IF-EU)

- need for 'energy management' topic
- need for fuel consumption metrics (ESRS alignment)
- 'ecosystem impacts' topic > 'biodiversity and ecosystem management'
- suggestion to have physical & transition risks in the same topic

2.2. Environment feedback



Metrics and technical protocols (IF-EU)

- feasibility concern on planned capacity (MW)
- need for different presentation of energy storage
- metrics needed related to fuels used to produce electricity
- suggestion for distinguishing 'in' and 'near' (sensitive location)
- more flexibility on distance of 5 km from sensitive location
- need for alignment with ESRS and GHGP for biogenic emissions

2.3. Social Feedback

Architecture through the interoperability lens:



Materiality articulation

- role of due diligence and impacts connected to financial materiality



Sector-agnostic nature

- change placement of Community Relations & Rights of Indigenous Peoples
- move due-diligence disclosures to IFRS S1
- consistency of topics (e.g. working conditions)



IFRS S1 articulation

- clarify the role of the narrative disclosures and sector-agnostic metrics in SASB



ESRS alignment

- key for EU preparers (definitions, architecture)

2.4. Social Feedback

Topics and metrics



Narrative vs quantitative balance

- balance narrative and quantitative disclosures



IF-EU energy

- affordability/pricing and critical materials: relevant metric deleted energy



Business model

- digital transformation and just transition partially covered

2.5. Governance feedback



Disclosure topics (FB-MP)

- Antibiotic use should not be a standalone topic
 - complex – 2-sided phenomenon
 - risks for both human and animal health



Metrics and technical protocols

(FB-MP)

- Reconsider the scope of the antibiotic use metric
- Certification and third-party audit verification useful indicators despite shortcomings
- A few (new) metrics needed for live animal transportation – suggestions added



(IF-EU)

- Challenge IEEE Std 1366

2.6. Industry descriptions



IF-EU Industry description

- need for biomass, geothermal, other renewable sources in description
- request for emphasis on commercial generation
- potential threshold 1 MW



FB-MP industry description

- fish and shellfish production

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THANK YOU