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## Invitation to comment

The International Sustainability Standards Board (ISSB) published the Request for Information *Consultation on Agenda Priorities* on 4 May 2023. Comments must be received by 1 September 2023.

The ISSB will develop and pursue its next two-year work plan subject to public consultation on agenda priorities (agenda consultation). The objective of the agenda consultation is to ask all those interested in sustainability-related financial reporting for their views on:

- the strategic direction and balance of the ISSB's activities;
- the suitability of criteria for assessing which sustainability-related matters (including topics, industries and activities) to prioritise and add to the ISSB's work plan; and
- a proposed list of new research and standard-setting projects that could be added to the ISSB's work plan.

Responses to the Request for Information will help the ISSB prioritise its activities for a two-year period. This period will commence in 2024 following determination of the work plan. The agenda consultation focuses on activities that form part of the ISSB's mission to deliver a comprehensive global baseline of sustainability-related financial disclosures that meet the information needs of an entity's existing and potential investors, creditors and other lenders—the primary users of general purpose financial reports.

This survey has been developed to help stakeholders respond to the questions in the Request for Information. The questions in this survey are identical to the questions in the Request for Information. You may download an [offline copy of the survey online here](#).

The ISSB encourages survey responses to increase its efficiency in gathering, analysing and drawing conclusions from the feedback. The ISSB will nevertheless accept comment letters in lieu of survey responses, which can be submitted by email to [commentletters@ifrs.org](mailto:commentletters@ifrs.org) or online from the [project comment letter page](#).

Your comments on this Request for Information are vital to the ISSB's standard-setting process.



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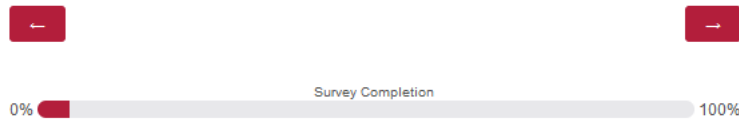
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### Working with the online survey

- To work with the online survey, you must enable cookies in your browser and on the survey site to prevent data loss if completing the survey over a long period.
- We recommend you complete the survey in one session. However, if you wish to come back to the survey to pick up where you left off, you must use the same browser and you must not clear your cookies.
- We also recommend you keep a copy of your survey answers if you are working with it over a long period. The survey questions are identical to the questions in the Request for Information.
- Please complete the survey in question order. If you need to return to a previous answer, you can navigate through the survey using the forward and back buttons, or by using the table of contents, which can be accessed from every page of the survey via the three lines in the upper left corner of the page.
- The survey will be saved automatically when you navigate to the next page. Please note that if you leave the survey before moving to the next page, the answers on the current page will not be saved.
- Each text box has a character limit of 20,000 (between 2860 and 5000 words with spaces included).
- To submit your response, please select the ‘Submit’ button at the end of the survey.
- Your survey response will be made publicly available on the IFRS Foundation website in line with the IFRS Foundation’s transparent due process.
- We recommend you refer to the ISSB’s Request for Information *Consultation on Agenda Priorities* while completing the survey to better inform your response.

### About the survey

- The survey consists of this introduction, an ‘About You’ section and eight sections containing questions aligned with those in the Request for Information.
- The ‘About You’ section must be completed in order to submit your response, but you do not need to respond to all the questions to submit your response.



### About you

Please provide your full name and email address:

First name:   
Last name:   
Email:

Are you responding as an individual, or on behalf of an organisation?

Please provide the name of the organisation you are responding on behalf of:

Are you responding on behalf of a global/international organisation?

Yes  
 No

Which jurisdiction are you (if responding as an individual) or your organisation (if responding on behalf of an organisation) based in?

Which of the following stakeholder groups best describes you or your organisation?

Stakeholder group:   
Entity type:

Which of the following industries best describes you or your organisation?

### Use of your personal data

Survey responses will be on the public record and posted on our website unless the respondent requests confidentiality and we grant your request. Such requests will not normally be granted unless supported by a good reason, for example, commercial confidence. If you would like to request confidentiality, please contact us at [commentletters@ifrs.org](mailto:commentletters@ifrs.org) before submitting your survey response.

By selecting 'I confirm' below, I confirm that:

- I give my explicit consent for any of my personal data (including my name) contained in this survey response to be published on the IFRS Foundation's website. If I am submitting this survey response on behalf of another individual or organisation and this survey response contains any other individual's personal details, I confirm that any such individuals have given their explicit consent to have their personal data published on the IFRS Foundation's website.
- By submitting a survey response on behalf of myself or an organisation I agree that the IFRS Foundation may contact me from time to time for the purpose of seeking further information or consultation in relation to this matter.

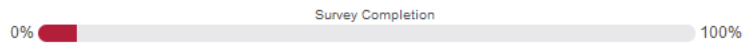
Consent can be withdrawn by emailing [commentletters@ifrs.org](mailto:commentletters@ifrs.org).

I confirm

Would you like to register an account with the IFRS Foundation website? If you select 'yes' below we will create a user record for the email address you have supplied in this survey and you will receive an email to verify your account and complete a registration process. During this registration process, you can set up a password and also set up email alerts about the IFRS Foundation's activities.

Yes

No



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## About you

Would you like to include any additional introductory information?

Yes

No

Please provide any additional details relevant to you (if responding as an individual) or your organisation (if responding on behalf of an organisation).

The Stakeholder Reporting Committee (SRC) is a committee of the European Accounting Association (EAA) whose mission is to actively participate in the debate about how organisations can, and should, inform their wide range of stakeholders about their activities, including their impact on society. It focuses on the non-financial or sustainability reporting. Further, given that non-financial information is increasingly attracting the interest of policy makers and standard setters, our committee also aims to create awareness of the policy issues amongst our membership, and to collaborate with policy makers and standard setters with a view to allowing the academic community's research expertise to have an impact on emerging policies and standards.



**Question 1—Strategic direction and balance of the ISSB's activities.**

Paragraphs 18–22 and Table 1 of the Request for Information provide an overview of activities within the scope of the ISSB's work.

(a) From highest to lowest priority, how would you rank the following activities?

Please drag and drop to rank, where 1 is the highest priority and 4 is the lowest priority.

- 1 beginning new research and standard-setting projects
- 2 supporting the implementation of ISSB Standards (IFRS S1 and IFRS S2)
- 3 researching targeted enhancements to the ISSB Standards
- 4 enhancing the Sustainability Accounting Standards Board (SASB) Standards

(b) Please explain the reasons for your ranking order and specify the types of work the ISSB should prioritise within each activity.

The SRC holds the view that activities categorized above as 1 ("beginning new research and standard-setting projects") and 2 ("supporting the implementation of ISSB Standards (IFRS S1 and IFRS S2)") carry equal significance. If the online system allowed, the SRC would allocate them identical priority level, denoted as 1.

To drive meaningful change, ISSB must develop comprehensive standards covering diverse topics beyond just climate. However, before proceeding on a topic-by-topic basis, SRC believes that it is essential to see a holistic list of topics that the ISSB envisions addressing in its standards. The success of current standards (S1 and S2) relies on their credible implementation. If poorly implemented, it may discourage widespread adoption of future standards. A cascading effect occurs, where effective standards pave the way for broader acceptance of future ones. Countries' progress in implementing recommendations on which standards are based (such as TCFD for S2) may differ, and this could influence the need for support in implementing S1 and S2.

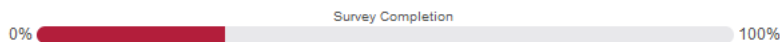
(c) Should any other activities be included within the scope of the ISSB's work? If so, please describe these activities and explain why they are necessary.

Yes

Before embarking on additional individual standards, please provide a full roadmap of where the body of standards is heading. In addition, please be explicit regarding the underlying architecture that the ISSB will follow in developing their standards – e.g., will you proceed chronologically on a topic-by-topic basis or will you tackle "Environment" as a pillar first (addressing subtopics such as climate, biodiversity, etc. in turn), followed by "Social", etc., and explain the rationale for your approach.

Interoperability should be kept top of mind as the ISSB rolls forward, particularly in conjunction with the EFRAG sustainability standards. With Europe as the undisputed world leader in sustainability reporting, we feel that it is essential to the ISSB's eventual global uptake to ensure that the ISSB standards articulate well with EFRAG's standards and the reporting regulations that are already in place in the EU.

No



**Question 2—Criteria for assessing sustainability reporting matters that could be added to the ISSB’s work plan**

Paragraphs 23–26 of the Request for Information discuss the criteria the ISSB proposes to use when prioritising sustainability-related reporting issues that could be added to its work plan.

(a) Do you think the ISSB has identified the appropriate criteria? Please explain your response.

Yes

SRC acknowledges that the ISSB has identified suitable criteria, but has reservations about their practical implementation. For instance, how will the determination of the matter’s importance to investors (criterion 1) be carried out? What measures will be put in place to ensure a credible assessment of this process? Similarly, how will the level of pervasiveness or acuteness of the matter for companies (criterion 4) be determined? How will you assess existing „deficiencies in disclosure“ (criterion 2) in contexts where there is currently limited disclosure and/or more extensive but diverse disclosure (i.e., recognizing that diversity in disclosure is not synonymous with deficiencies in disclosure)? will it be assessed on the basis of feedback received, or comprehensively analyzing the sustainability reports? Furthermore, replacing diversity in disclosure with consistency in disclosure is also an important objective that should be made explicit in the agenda. On a related but separate point, the ISSB should recognize that „investors“ are not a homogeneous group. What efforts are being made to include perspectives from across diverse investor groups?

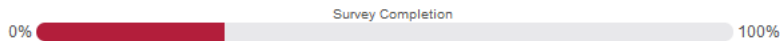
No

(b) Should the ISSB consider any other criteria? If so what criteria and why?

Yes

Whether there are any well-established frameworks, such as TCFD (climate) or TNFD (biodiversity, ecosystems and ecosystem services), upon which ISSB can build to enhance the efficiency of the process. In addition, to avoid diversity in the future, it would be necessary to take into account existing standards, such as those issued by GRI and EC/EFRA, in order to have interoperability between them so that ISSB standards are a “baseline”. The ability to take advantage of such developments, often already in use by investors, should promote the recognition that a potential project will meet their needs and will avoid the likely extensive consultations and potentially multiple exposure drafts that may be required in reporting contexts that are less well defined.

No



**Question 3—New research and standard-setting projects that could be added to the ISSB's work plan**

Paragraphs 27–38 of the Request for Information provide an overview of the ISSB's approach to identifying sustainability-related research and standard-setting projects. Appendix A describes each of the proposed projects that could be added to the ISSB's work plan.

(a) Taking into account the ISSB's limited capacity for new projects in its new two-year work plan, should the ISSB prioritise a single project in a concentrated effort to make significant progress on that, or should the ISSB work on more than one project and make more incremental progress on each of them?

Single project

More than one project

(ii) If more than one project, which projects should be prioritised and what is the relative level of priority from highest to lowest priority? You may select from the four proposed projects in Appendix A or suggest another project (or projects). Please explain your response.

Biodiversity, ecosystems and ecosystem services

The SRC holds the view that projects „Biodiversity, ecosystems and ecosystem services“ and „Human capital and human rights“ carry equal significance and are considerably more important than „Integration in reporting“.

SRC believes that „Biodiversity, ecosystems and ecosystem services“ is an extensive project covering numerous issues, while human-related projects appear smaller and are split into two separate ones. Perhaps it would be beneficial to consider dividing „Biodiversity, ecosystems and ecosystem services“ into smaller, more manageable subcomponents (that could be completed more expediently without sacrificing due consideration). On the other hand, if the ISSB's reasoning in combining these topics is that doing so aligns better with the TNFD framework that will underly any new ISSB standard, the ISSB should make that reasoning explicit.

Human capital

SRC also recommends either merging the two human-related projects into a single cohesive project (named „own workforce“), or alternatively, retaining both human-related projects but renaming „human capital“ to something like „workforce“ in order to better delineate the scope of each project.

If the human projects are to be split, we favor prioritizing workforce over human rights. This is not because we consider the firm's own workforce to be socially more important than the broader concept of human rights. Instead, our reasoning is that there now exist various statutes and regulations (e.g., the EU's new Corporate Sustainability Due Diligence Directive (CSDDD)) that are designed to enforce acceptable behavior along the supply chain (i.e., statutes that have specifically been established to protect and uphold human rights), and these are likely to be more effective than corporate disclosure in curbing any such undesirable activities. In other words, a human rights disclosure standard is likely to be of second order importance given increased legislation in many jurisdictions, including notably those that are more likely to be early ISSB adopters. Furthermore, any corporate violations of such laws would already be required disclosures under other corporate reporting standards and regulations related to material risks.

Human rights

Related comment is posted above.

Integration in reporting

Other—please explain



**Question 4—New research and standard-setting projects that could be added to the ISSB’s work plan: Biodiversity, ecosystems and ecosystem services**

The research project on **biodiversity, ecosystems and ecosystem services** is described in paragraphs A3–A14 of Appendix A to the Request for Information. Please respond to these questions:

(a) Of the subtopics identified in paragraph A11, to which would you give the highest priority?  
Please select as many as applicable.

Please explain your choice and the relative level of priority with particular reference to the information needs of investors. You may also suggest subtopics that have not been specified. To help the ISSB analyse the feedback, where possible, please provide:

- a short description of the subtopic (and the associated sustainability-related risks and opportunities); and
- your view on the importance of the subtopic with regard to an entity’s sustainability-related risks and opportunities and the usefulness of the related information to investors.

Freshwater and marine resources and ecosystems use
Land-use and land-use change
Pollution (including emissions into air, water and soil)
Resource exploitation (for example, material sourcing and circular economy)
Invasive non-native species
Other—please specify
The SRC finds that without established criteria for evaluating these topics, any form of ranking appears arbitrary. Furthermore, the priority of each topic would seem to be contextual (e.g., by industry or by location).



**Question 4—New research and standard-setting projects that could be added to the ISSB’s work plan: Biodiversity, ecosystems and ecosystem services**

(b) Do you believe that sustainability-related risks and opportunities related to **biodiversity, ecosystems and ecosystem services** are substantially different across different business models, economic activities and other common features that characterise participation in an industry, or geographic locations such that measures to capture performance on such sustainability-related risks and opportunities would need to be tailored to be specific to the industry, sector or geographic location to which they relate?

Yes

No

(i) Please explain your reasoning and provide examples of how sustainability-related risks and opportunities related to this topic will be substantially different across different industries, sectors or geographic locations.

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**Question 4—New research and standard-setting projects that could be added to the ISSB's work plan: Biodiversity, ecosystems and ecosystem services**

(c) In executing this project, the ISSB could leverage and build upon the materials of the ISSB and other standard-setters and framework providers to expedite the project, while taking into consideration the ISSB's focus on meeting the needs of investors. Which of the materials or organisations referenced in paragraph A13 should be utilised and prioritised by the ISSB in pursuing the project? Please select as many as applicable.

Please explain your choices and the relative level of priority with particular reference to the information needs of investors. If you would like to suggest materials that are not specified, please select 'Other' and give your suggestion(s) in the comment box. You can suggest as many materials as you deem necessary.

To help the ISSB analyse the feedback, where possible, please explain why you think the materials are important to consider.

The Climate Disclosure Standards Board (CDSB) Framework application guidance for biodiversity and water-related disclosures	Because of the relevance to the raised issues and widespread application.
The SASB Standards	Because of the relevance to the raised issues and widespread application.
The Integrated Reporting Framework	Because of the relevance to the raised issues and widespread application.
The Global Reporting Initiative (GRI) standards (for example, GRI 304 – Biodiversity)	Because of the relevance to the raised issues and widespread application.
The Taskforce on Nature-related Financial Disclosures (TNFD)	Because of the relevance to the raised issues and expected widespread application.
The Partnership for Biodiversity Accounting Financials (PBAF)	Because of the relevance to the raised issues and widespread application.
The Capitals Coalition	
The Science Based Targets Network	Because of the relevance to the raised issues and widespread application.
The European Financial Reporting Advisory Group (EFRAG)	Because of the relevance to the raised issues and widespread application.
The European Commission's Align project	
The EU Business and Biodiversity Platform	
The World Benchmarking Alliance	
The United Nations Declaration on the Rights of Indigenous Peoples	Because of the relevance to the raised issues and widespread application.
Other—please specify	Partnership for Carbon Accounting Financials (PCAF), which has advanced the reporting of financed carbon emissions by financial institutions.



**Question 5—New research and standard-setting projects that could be added to the ISSB's work plan: Human capital**

The research project on **human capital** is described in paragraphs A15–A26 of Appendix A to the Request for Information. Please respond to these questions:

(a) Of the subtopics identified in paragraph A22, to which would you give the highest priority? Please select as many as applicable.

Please explain your choices and the relative level of priority with particular reference to the information needs of investors. You may also suggest subtopics that have not been specified. To help the ISSB analyse the feedback, where possible, please provide:

- a short description of the subtopic (and the associated sustainability-related risks and opportunities); and
- your view on the importance of the subtopic with regard to an entity's sustainability-related risks and opportunities and the usefulness of the related information to investors.

Worker wellbeing (including mental health and benefits)	
Diversity, equity and inclusion	
Employee engagement	
Workforce investment	
The alternative workforce	
Labour conditions in the value chain	
Workforce composition and costs	
Other—please specify	

• As per previous comments, SRC suggests renaming "human capital" to something along the lines of "own workforce" as in ESRS in order to more clearly delineate the scope of the standard. It is notable in this regard, e.g., that the U.S. SEC expressly refused to define "human capital" in relation to their recent issuance of human capital disclosure regulations. "Own workforce" would be subject to clearer definition, and likely better defined reporting requirements, enabling the more expedient development of a much-needed reporting standard in this area, and one that is also likely to be subject to greater consensus than a broader, and more difficult to report on topic that also encompasses supply chain issues.

• To the previous point, "labor conditions in the value chain" would seem to clearly fall under the scope of the human rights project rather than the firm's own human capital (or, preferably in terms of terminology, "workforce")?

• Does "worker well-being" not encompass diversity, equity, and inclusion? In our view, these should not be considered separate topics, but rather one is a subtopic of the other.

• In general, greater specificity and clear definitions will be required at the outset of this project in order to guide what should fall into each of two projects (or covered in subtopical areas within a combined project). For example, "worker wellbeing" would seem to be all-encompassing rather than a separate topic on its own, should the "alternative workforce" (presumably referring to gig economy workers?) be considered part of a firm's "own workforce" or is this part of their supply chain and thus covered under the human rights project (or subtopic if the two human topics are ultimately combined), etc.?

**Question 5—New research and standard-setting projects that could be added to the ISSB’s work plan: Human capital**

(b) Do you believe that sustainability-related risks and opportunities related to **human capital** are substantially different across different business models, economic activities and other common features that characterise participation in an industry, or geographic locations such that measures to capture performance on such sustainability-related risks and opportunities would need to be tailored to be specific to the industry, sector or geographic location to which they relate?

Yes

No

(i) Please explain your reasoning and provide examples of how sustainability-related risks and opportunities related to this topic will be substantially different across different industries, sectors or geographic locations.

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**Question 5—New research and standard-setting projects that could be added to the ISSB’s work plan: Human capital**

(c) In executing this project, the ISSB could leverage and build upon the materials of the ISSB and other standard-setters and framework providers to expedite the project, while taking into consideration the ISSB’s focus on meeting the needs of investors. Which of the materials or organisations referenced in paragraph A25 should be prioritised by the ISSB in pursuing its research? Please select as many as applicable.

Please explain your choices and the relative level of priority with particular reference to the information needs of investors. If you would like to suggest materials that are not specified, please select ‘Other’ and give your suggestion(s) in the comment box. You can suggest as many materials as you deem necessary.

To help the ISSB analyse the feedback, where possible, please explain why you think the materials are important to consider.

The SASB Standards and related research and standard-setting projects

Because of the relevance to the raised issues and widespread application.

The CDSB Framework for reporting environmental and social information

Because of the relevance to the raised issues and widespread application.

The Integrated Reporting Framework

Because of the relevance to the raised issues and widespread application.

The Capitals Coalition

The International Labour Organization (ILO)

Because of the relevance to the raised issues and widespread application.

The European Financial Reporting Advisory Group (EFRAG)

Because of the relevance to the raised issues and widespread application.

The Global Reporting Initiative (GRI)

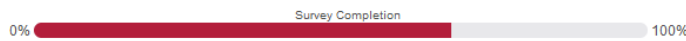
Because of the relevance to the raised issues and widespread application.

The US Securities and Exchange Commission

The World Economic Forum (WEF) International Business Council's core metrics and disclosures on sustainable value creation

Other—please specify

Human Capital Management Coalition, Workforce Disclosure Initiative (both mentioned in the RFI document and not listed above).



### Question 6—New research and standard-setting projects that could be added to the ISSB's work plan: Human rights

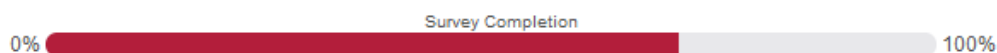
The research project on **human rights** is described in paragraphs A27–A37 of Appendix A to the Request for Information. Please respond to these questions:

(a) Within the topic of **human rights**, are there particular subtopics or issues that you feel should be prioritised in the ISSB's research? You can suggest as many subtopics or issues as you deem necessary.

To help the ISSB analyse the feedback, where possible, please provide:

- a short description of the subtopic (and the associated sustainability-related risks and opportunities); and
- your view on the importance of the subtopic with regard to an entity's sustainability-related risks and opportunities and the usefulness of the related information to investors.

While human rights remain a crucial and significant topic, it appears to be relatively well-addressed in existing international and jurisdictional regulations compared to other subjects. It is probable that many jurisdictions with established laws in this regard will be among the early adopters of the ISSB standards. As a result, ISSB could consider prioritizing this project at a later stage on the agenda.



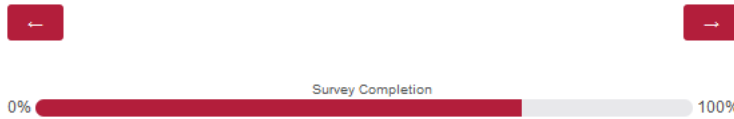
**Question 6—New research and standard-setting projects that could be added to the ISSB’s work plan: Human rights**

(b) Do you believe that sustainability-related risks and opportunities related to **human rights** are substantially different across different business models, economic activities and other common features that characterise participation in an industry, or geographic locations such that measures to capture performance on such sustainability-related risks and opportunities would need to be tailored to be specific to the industry, sector or geographic location to which they relate?

Yes

No

(i) Please explain your reasoning and provide examples of how sustainability-related risks and opportunities related to this topic will be substantially different across different industries, sectors or geographic locations.



**Question 6—New research and standard-setting projects that could be added to the ISSB’s work plan: Human rights**

(c) In executing this project, the ISSB could leverage and build upon the materials of the ISSB and other standard-setters and framework providers to expedite the project, while taking into consideration the ISSB’s focus on meeting the needs of investors. Which of the materials or organisations referenced in paragraph A36 should be prioritised by the ISSB in pursuing its research? Please select as many as applicable.

Please explain your choices and the relative level of priority with particular reference to the information needs of investors. You can suggest materials that are not specified—please select ‘Other’ and give your suggestion(s) in the comment box. You can suggest as many materials as you deem necessary.

To help the ISSB analyse the feedback, where possible, please explain why you think the materials are important to consider.

The CDSB Framework for reporting environmental and social information	Because of the relevance to the raised issues and widespread application.
The SASB Standards	Because of the relevance to the raised issues and widespread application.
The Integrated Reporting Framework	Because of the relevance to the raised issues and widespread application.
The International Labour Organization	Because of the relevance to the raised issues and widespread application.
The UN Guiding Principles on Business and Human Rights and the associated UN Guiding Principles Reporting Framework	Because of the relevance to the raised issues and widespread application.

The World Benchmarking Alliance's Corporate Human Rights Benchmark

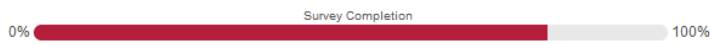
The United Nations Declaration on the Rights of Indigenous Peoples

Because of the relevance to the raised issues and widespread application.

The cross-industry metrics associated with the WEF International Business Council's dignity and equality theme

Other—please specify

OECD Guidelines for Multinational Enterprises, International Bill of Human Rights (required by the minimum safeguards outlined in the EU Taxonomy Regulation ((Regulation (EU) 2020/852 of the European Parliament and of the Council)). Supply chain-related laws existing in different countries.





**Question 7—New research and standard-setting projects that could be added to the ISSB's work plan:  
Integration in reporting**

The research project on **integration in reporting** is described in paragraphs A38–A51 of Appendix A to the Request for Information. Please respond to these questions:

(a) The integration in reporting project could be intensive on the ISSB's resources. While this means it could hinder the pace at which the topical development standards are developed, it could also help realise the full value of the IFRS Foundation's suite of materials. How would you prioritise advancing the integration in reporting project in relation to the three sustainability-related topics (proposed projects on biodiversity, ecosystems and ecosystem services; human capital; and human rights) as part of the ISSB's new two-year work plan? Please explain your response.

Integration in reporting project is a **higher priority**

Integration in reporting project is a **lower priority**

SRC believes that it is more important to have strong connectivity between financial and sustainability reporting before attempting to move to fully integrated reporting. Furthermore, until we have additional sustainability reporting standards, it is not clear what would be subject to integration.

(b) In light of the coordination efforts required, if you think the integration in reporting project should be considered a priority, do you think that it should be advanced as a formal joint project with the IASB, or pursued as an ISSB project (which could still draw on input from the IASB as needed without being a formal joint project)? Please explain how you think this should be conducted and why.

Formal joint project

ISSB project



**Question 7—New research and standard-setting projects that could be added to the ISSB’s work plan: Integration in reporting**

(c) In pursuing the project on ‘integration in reporting’, do you think the ISSB should build on and incorporate concepts from:

(i) the IASB’s *Exposure Draft Management Commentary*?

If you agree, please describe any particular concepts that you think the ISSB should incorporate in its work. If you disagree, please explain why.

Yes

No

(ii) the *Integrated Reporting Framework*?

If you agree, please describe any particular concepts that you think the ISSB should incorporate in its work. If you disagree, please explain why.

Yes

No

(iii) other sources?

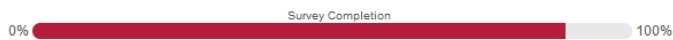
If you agree, please describe the source(s) and any particular concepts that you think the ISSB should incorporate in its work. If you disagree, please explain why.

Yes

No

(d) Do you have any other suggestions for the ISSB if it pursues the project?

No.

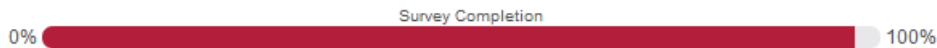


## Question 8—Other comments

Do you have any other comments on the ISSB's activities and work plan?

The SRC suggests adding Tax Transparency as a priority project. This topic is of high importance to the world's largest responsible investors (see, e.g., NBIM's companies' expectations statement related to Tax and Tax Transparency (link: <https://www.nbim.no/contentassets/48b3ea4218e44caab5f2a1f56992f67e/expectations-document---tax-and-transparency---norges-bank-investment-management.pdf>), it has been the subject of numerous shareholder proposals in recent years, and it has received significant attention in the financial press (reflecting capital market concerns over, and demand for, this information), and has even recently been highlighted as a critical issue by a Nobel Laureate (link: <https://www.theage.com.au/business/the-economy/pwc-scandal-should-remind-albanese-to-stay-strong-on-multinational-tax-secrecy-20230716-p5domv.html?btis=>).

Importantly, there is an existing GRI standard, as well as OECD guidelines, related to tax transparency, so the development of an ISSB standard could be done with expediency as it would not require "reinventing the wheel." Relative to other topics on the ISSB's proposed priority list, this would be a much more focused, constrained, and thus more manageable undertaking that could be classified as a small (or at most medium) project that could be completed relatively quickly. Furthermore, companies are already required to privately provide country-by-country reporting, so relative to all/most of the other projects being proposed for the ISSB's agenda, there would be little incremental cost to companies reporting this tax transparency information. In other words, a tax transparency standard would be implementable sooner rather than later, which is almost certainly not the case with, e.g., the Biodiversity, ecosystems and ecosystem services standard.



Request for Information Consultation on Agenda Priorities—Survey

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- Submit survey

The ISSB will consider all written comments and responses to the survey received by 1 September 2023.

Survey responses will be on the public record and posted on our website unless the respondent requests confidentiality and we grant your request. Such requests will not normally be granted unless supported by a good reason, for example, commercial confidence. If you would like to request confidentiality, please contact us at [commentletters@ifrs.org](mailto:commentletters@ifrs.org) before submitting your survey response.

If you would like to amend any of your answers before submitting, you can use the table of contents above to return to the relevant section of the survey.

To complete the survey please select the "submit" button below.

By submitting the survey below I confirm that:

- I give my explicit consent for any of my personal data contained in this survey response to be published on the IFRS Foundation's website. If I am submitting this survey response on behalf of another individual or organisation and this survey response contains any other individual's personal details, I confirm that any such individuals have given their explicit consent to have their personal data published on the IFRS Foundation's website.
- By submitting a survey response on behalf of myself or an organisation I agree that the IFRS Foundation may contact me from time to time for the purpose of seeking further information or consultation in relation to this matter.



Thank you for completing the survey on Request for Information *Consultation on Agenda Priorities*. Your response will be made publicly available on the IFRS Foundation website in line with the IFRS Foundation's due process and will inform the future deliberation of the ISSB.

