

Patrick de Cambourg
Square de Meeûs 35 - 1000 Brussels

Emmanuel Faber
Chair of the International Sustainability Standards Board (ISSB)
Opernplatz 14 – 60313 Frankfurt

16 June 2025

Dear Emmanuel,

First and foremost, we would like to acknowledge the substantial and high-quality work undertaken in enhancing the SASB Standards. Every step towards better sustainability reporting at global level has our full support as already illustrated by the joint interoperability mapping issued in May 2024 by the ISSB and EFRAG and by our current efforts to enhance further interoperability.

However, given the complexity and breadth of these standards, we believe that extending the public consultation period from 120 days to 180 days would provide stakeholders with the necessary time to thoroughly review and provide meaningful feedback. This extension would also facilitate synchronisation with ongoing European legislative and standard-setting initiatives, with a view to maintaining and potentially enhance interoperability and avoiding potential jurisdictional challenges.

Given (i) that the European Union co-legislators are currently discussing the Omnibus proposals tabled by the European Commission on 26 February 2025 which are critically important for sustainability reporting in the Union and that the legislative process may only be finalised by year-end or early 2026 and (ii) that, in parallel, EFRAG is tasked with delivering technical advice on revised draft ESRS sector-agnostic standards to the European Commission by the end of October 2025, we believe the suggested extension would give EFRAG the possibility to provide more meaningful comments.

In such a context, the status of sector-specific standards and/or guidelines and the related consequences in terms of standard-setting in the Union and globally is critical. This is why EFRAG intends to dedicate particular attention to the evolution of reporting frameworks focusing on sector-specific information, such as the SASB one. This underscores the importance of allocating sufficient time for stakeholder engagement and feedback collection to ensure interoperability to the maximum extent possible.

Therefore, a comprehensive review of these standards - including providing feedback on the nine prioritized standards and the targeted amendments across a further 41 industries - is needed and requires substantial time and effort. It also implies a thorough and well-supported consultation process to gather evidence in line with European expectations and requirements, bearing in mind that European and other stakeholders are already mobilised to contribute to the ESRS simplification exercise.

In light of the above considerations, EFRAG suggests that the public consultation period for the SASB standards be extended to 180 days. We believe that this extension will benefit all stakeholders.

We appreciate your attention to this suggestion and look forward to your favourable response.

Sincerely yours.



Patrick de Cambourg
Chair of EFRAG Sustainability Reporting Board