

Appendix 1. Detailed analysis

We recognise and appreciate the changes proposed, many of which we support. For conciseness, the environmental comments below focus on the areas of potential improvements to ensure the final content of SASB standards is most appropriate.

Reservations towards disclosures potentially challenging in practice

Metrics on probable reserves (ISSB questions 6(d), 9(d), 10(d))

1. Oil and Gas, Coal Operations and Metals and Mining standards require disclosure of metrics related to both proven and probable reserves (EM-CO-160a.3, EM-CO-210b.3, EM-CO-210c.1, EM-EP-160a.3, EM-EP-210b.3, EM-EP-210c.1, EM-MM-160a.3, EM-MM-210b.3, EM-MM-210c.1). This refers to disclosure of percentage of reserves in or near environmentally sensitive locations, Indigenous Peoples' land, conflict-affected and high-risk areas. In addition, Coal Operations and Exploration and Production standards envisage disclosure on resilience of probable reserves to changes in prices being applied to greenhouse gas emissions (EM-CO-420a.1., EM-EP-420a.1.). We note that based on feedback received by EFRAG in its earlier sector work, requiring information related to probable reserves may be challenging for the entities operating within these industries. For example, large part of entities in oil and gas sector discloses information on reserves according to the SEC rules, which does not require mandatory information on probable reserves.
2. In addition, we note that EM-MM-160a.3 requires disclosure of percentage of reserves in or near environmentally sensitive locations whereas these locations are defined by set of vast and conceptual criteria ('being important for biodiversity') and include, among others, International Union for Conservation of Nature (IUCN) protected areas (categories I–VI), Ramsar Wetlands of International Importance, and Natura 2000 sites. Pursuant to feedback received from stakeholders, all mining companies have some mines located close to Natura 2000 sites, and it is still allowed to operate in Natura 2000 sites in Europe. This requirement, together with that on Ramsar Wetlands areas, is considered too constraining and EFRAG suggests it to be removed. With regards to IUCN, the suggestions received by EFRAG include limiting the areas to IUCN I to III.
3. With regard to EM-MM-210c.1 that requires disclosure of percentage of reserves in conflict-affected and high-risk areas, feedback received by EFRAG indicates that this disclosure is too detailed, potentially confidential and that countries and high-risk areas are not sufficiently defined.

Metrics with list of sites (ISSB questions 6(d), 9(d), 10(d))

4. The revision of standards adds metrics for description of water-related risks and opportunities and strategies to manage them, including any targets set to monitor progress. We note that technical protocols for the metrics include (1) disclosure of location of operating facilities where water-related risks are concentrated, as well as (2) how water-related risks vary by their location. Following feedback received earlier, both during the sector work and ESRS revision, EFRAG notes a potential risk of lengthy reporting resulting from a requirement which appears to mandate site-by-site disclosures. This comment refers to three metrics (EM-EP-140a.6; EM-CO-140a.3, EM-MM-140a.4). Feedback received by EFRAG indicates that these metrics are considered too granular and its proposed level of detail may not be acceptable for the industry.

Metrics on releases from rail transport (ISSB question 11(d))

5. We note that EM-MD-540a.3. requires disclosure of *number of (1) accident releases and (2) non-accident releases from rail transport*. Focus on releases from rail transportation can be tracked back to SASB Research Briefs (2014) which highlight the prominence of this mode of transport in US, largely due to exploitation of the Bakken formation in 2013, where lack of pipeline infrastructure led to a surge of rail transport (reaching up to 71%), and was associated with several important accidents. The relevance of this metric in the current European context in oil and gas industry is debatable, due to much stronger reliance on pipelines and marine transport, having shipments by rail playing a far less significant role.

6. Moreover, pursuant to feedback received in sector work, requiring only rail transportation accident figures could lead to a competitive disadvantage compared to other transport modes, such as inland waterways, sea shipping or road transport.

Metrics introduced for off-contract activities (ISSB questions 13(d), 13(e))

7. The revision of SASB Oil & Gas – Services standard emphasises that service providers in the industry have limited control over the planning, design and operational decisions on site. In this context (taking into account the standards are meant to provide information that could reasonably be expected to affect an entity's prospects due to its activities), several quantitative metrics are being removed from the standard. These are, for example, metrics on volume of hydraulic fracturing fluid used and percentage hazardous [of total fluid used], average disturbed land area per oil and gas well site, volume of water handled in operations and percentage recycled.
8. Pursuant to the Basis for Conclusions, ISSB considers the deleted metrics inaccurately portray the degree of control service-provider entities have over field operations while on-contract. In the ISSB's view, the standard should focus on products, technologies and services offered to customers. Consequently, new narrative disclosures on description of services and technologies offered to customers are introduced in the standard. EFRAG notes that this conclusion stands in contrast with earlier conclusions of SASB due process, and notably SASB Basis for Conclusions (2018) and SASB Research Briefs (2024) that present a technical rationale for inclusion of the abovementioned metrics, while recognising the distinct element of products/resources handling and use by the industry.
9. It can be noted that feedback received by EFRAG from oil and gas service industry indicates that service providers should not be exempt from disclosing the quantitative and qualitative metrics previously required by SASB. We also note that replacing the quantitative disclosures by requirements consisting of narrative text explaining the 'entity's offerings' (EM-SV-110a.2, EM-SV-140a.2, EM-SV-150a.2, EM-SV-160a.2) can lead to complex disclosures that vary significantly between entities, leading to low comparability and high audit efforts.

Metrics on underground Storage Tanks (ISSB question 12(d))

10. We note that EM-RM-150a.2 requires disclosure of *number of underground storage tanks (UST)*. Previous industry feedback received by EFRAG in development of sector standards suggested a possibility of limited relevance of the metric.

Metrics on Product Innovation (ISSB question 7(d))

11. The Construction Materials SASB standard introduces disclosure of *percentage of products that qualify for credits in sustainable building design and construction certifications* (EM-CM-410a.1). Originally, this disclosure was developed to reflect specific megatrends in US Construction materials industry (SASB Research Brief 2014). Pursuant to this, it envisages certifications such as BREEAM®, Green Globes®, LEED® or other certifications considered as generally accepted.
12. The revision made by ISSB specifies that 'products that qualify for credits (...) include those with and Environmental Product Declaration (EPD)'. This wording can be potentially problematic, as EPDs support evaluating the performance under green building schemes, but are not regarded as a certificate of sustainability on its own. We recognise that EPD is a standardised tool to communicate transparent, third-party verified life-cycle information about a product's environmental impact, which can then be further classified as sustainable.
13. Secondly, we note that EM-CM-410a.1. speaks about products that *qualify for credits*, rather than certified products. Considering that details of determination of this qualification are not provided and in the absence of more detailed methodology, this may open to variety of interpretation on how to fulfil the requirements, ranging from eventual certification up to the entity's self-assessment. Such a broad scope of disclosure may limit clarity and comparability between entities that report actually certified products and those reporting on products which may potentially be certified (qualify for) in the future. This can eventually give a raise to a high auditing cost.
14. We also note that a metric within the Product Innovation (EM-CM-410a.2), requires reporting of *total revenue from products that reduce environmental impacts caused during production or use*. It can be noted that this metric lacks criteria, guidance, thresholds or methodologies that would support harmonised assessment of whether a product contributes to reducing energy use, emissions, or

resource consumption. This too may be problematic in obtaining comparable disclosures of environmental benefits.

15. While some industry stakeholders consulted by EFRAG appreciated the current wording and possible room for interpretation as to what product innovation disclosures require, others pointed out to need of scientific, standardised methodology for the disclosures.

Interoperability comments

Metrics on energy (ISSB questions 2(b)(c), 6(g), 7(g), 8(f), 9(g), 10(h) 14(f))

16. EFRAG notes several concerns regarding the metrics in Energy Management and their interoperability with ESRS and EU regulation.
17. Some metrics refer to electricity from renewable energy sources (EM-CM-130a.1., EM-IS-130a.1., EM-MM-130a.1., EM-EP-420a.3, FB-PF-130a.1.) and in that context, renewable energy sources are defined as *capable of being replenished in a short through ecological cycles or agricultural processes, such as geothermal, wind, solar, hydro and biomass*. This definition, similar to EPA glossary, was introduced in SASB standards in 2014 and may pose challenges in alignment with Renewable Energy Directive (EU) 2018/2001 and (EU) 2023/2413. In particular, the current wording can be ambiguous and limiting to sources such as biogas, landfill gas, geothermal energy, or ambient energy. A way to improve it could be to amend definition to reflect the regulatory context of Europe.
18. Several metrics (EM-CM-130a.1, EM-IS-130a.1, EM-MM-130a.1, FB-PF-130a.1), while requesting the disclosure of electricity consumed, specify that *electricity includes electricity, heating, cooling, or steam*, which is seen as problematic because the disclosure asks for electricity, which is not equivalent to these other energy forms. It could be assumed that intention of revision was making reference to *energy including purchased or acquired electricity, heat, steam, or cooling*, although this wording would currently not be fit for the disclosure which was limited to electricity only.
19. It is also noted that while some standards place energy metrics under Energy Management topic, the SASB Oil & Gas – Services standard proposes total fuel and renewable fuel consumed disclosure (EM-SV-110a.1) under *Greenhouse Gas Emission management* topic instead. It is also unclear whether the (EM-SV-110a.1) metric is intended to form part of the IFRS S2 Industry Guidance. Reporting energy metrics sometimes as part of Energy Management topic, while at other times under GHG Emission topic, undermines internal alignment and may be confusing for preparers. Moreover, the SV metric introduces unique definition of *renewable fuel*, which is defined as *fuel derived from biomass*, which may be problematic in terms of internal consistency
20. It can also be noted that O&G Exploration and Production standard refers to renewable energy, while this is addressed within its Climate Resilience topic (EM-EP-420a.3, EM-EP-420a.4). Addressing investment in renewable energy in Climate Resilience and not in Energy Management topic may also be seen inconsistent across the SASB approach. Moreover, the SV metric introduces unique definition of *renewable fuel*, which is defined as *fuel derived from biomass*, which risks narrowing it to renewable fuels derived exclusively from one source.
21. Two metrics in two different standards speak about the concept of *alternative energy*. CM standard (EM-CM-130a.1) requires quantity of energy consumed from alternative sources. This disclosure, retaining the wording introduced in 2014 SASB, is defining *alternative sources of energy* as including *used tyres, spent solvents and waste oils, processed municipal solid waste, household waste, agricultural waste such as rice, peanut shells and coffee husks, animal meal and sewage sludge*. Feedback received by EFRAG from stakeholders indicated that limiting the disclosure only to narrow range of feedstocks may not be appropriate. At the same time, EP standard (EM-EP-420a.3) - within the Climate Resilience topic disclosure - requires amounts invested in alternative energy sources, without a definition of such sources. In both cases, we note that alternative energy is not defined in regulatory context in Europe.
22. In addition, all metrics within Energy Management topic omit the renewable fuel consumption and refer to *renewable electricity* only, which may limit their interoperability and overlook common and relevant renewable fuels for transition, such as biogas, biomass, hydrogen or biofuels.
23. Finally, SASB requires energy data to be reported in gigajoules (GJ) (EM-CM-130a.1, EM-IS-130a.1, EM-MM-130a.1), whereas ESRS uses megawatt-hours (MWh). This may further limit comparability.

Metrics with fixed ‘in or near’ distance (ISSB questions 4(a), 6(g), 9(g), 10(h), 12(f), 13(g))

24. SASB standards (EM-CO-160a.3, EM-RM-120a.2, EM-MM-160a.3, EM-EP-160a.3) define ‘in or near’ as any part of facility footprint being within a fixed distance (e.g. 5 km). A top-down definition of proximity (e.g. by defining a default distance radius of 5 km) can help preparers to more easily identify if their sites are ‘near’ a relevant area and foster comparability - but at the same time can be problematic, as impacts on the environment and connected risks aren’t necessarily contained to a specific radius (e.g. river pollution can spread far downstream from its source). It is recommended that preparers assess its area of influence (area affected or potentially affected) and that the application of buffer distances specific to the undertaking’s type of activity – and following regulatory requirements, science-based recommendations and industry best practice – is to be highlighted as one tool to do so.

Metrics related to ETS (ISSB questions 6(g), 7(g), 8(f), 9(g), 11(g), 12(f), 14(g))

25. The disclosure on Scope 1 emissions specifies, within its technical protocol, emissions ‘subject to applicable jurisdictional greenhouse gas laws, regulations or programmes intended to limit or reduce greenhouse gas emissions directly’ (EM-MD-110a.1, EM-EP-110a.1, EM-CO-110a.1, EM-CM-110a.1, EM-IS-110a.1, EM-MM-110a.1, EM-RM-110a.1, EM-SV-110a.4). The scope of disclosure is not sufficiently clear and may be seen as referring to a broader range of GHG regulatory mechanisms than currently required by the ESRS, which focuses on regulated emission trading schemes and EU ETS in particular. We note that a previously existing reference to the EU ETS, included in SASB as an example, was removed and we recommend its reinstatement.
26. This difference between current broad language of SASB and scope of regulated emission trading schemes is perceived as unclear by some stakeholders. It may create confusion regarding which types of regulatory mechanisms are to be considered. A clarification is needed whether in this context, mechanisms such as EU’s Carbon Border Adjustment Mechanism (CBAM) are expected under the disclosure. Should this be the case, SASB requirements capture larger scope than ESRS.

Metrics related to waste (ISSB question 8(f))

27. Within the disclosures, we observe the need of closer alignment of technical protocol terminology with the EU Waste Framework Directive to avoid ambiguity of terms such as ‘portion of products discarded in landfill’. In EU law, a substance or object become waste at the point they are intended to be discarded, rather than landfilled. In addition, reference to product in context of landfill may imply the product remains within the product life cycle. ‘Discarded in landfill’ conflates the moment waste status emerges with the disposal method. A potential enhancement would be to include precise terms such as, for example, waste ‘sent to landfill’ to ensure clarity.

Metrics on biodiversity (ISSB questions 4(a), 6(g), 7(g), 9(g), 11(g), 13(g))

28. EFRAG Secretariat also notes the renaming of the disclosure topic from *Biodiversity Impacts* to *Ecological Impacts*, aligning with the MD approach (also applied in CO, CM, and MM; in EM-SV, *Impact Management* was renamed *Ecological Impacts*). While we recognise this change reflects an effort to frame biodiversity within a broader ecological context, we note that it departs from the terminology used in ESRS. Feedback received from European stakeholders indicates preference to maintaining ‘biodiversity’ as aligned with terminology of CSRD.
29. The broadening of the biodiversity topic to the wider concept of nature may be a step in the right direction. However, the specific treatment of biodiversity has significantly deteriorated as a result, with the removal of key definitions and specific disclosure requirements that are essential for producing reliable and comparable information. For instance, there is no reference to dependencies on ecosystem services - which may represent material financial risks depending on the sector - nor direct impact drivers on biodiversity loss - that inform on transition risks. Only impacts are mentioned (once), whereas identifying pressures is critical for understanding transition risks faced by the undertaking. Better alignment with TNFD and SBTN could also help in that regard.
30. With regards to biodiversity and the addition of EM-EP-160a.4 on the disclosure of total spatial footprint of operations in terrestrial, freshwater aquatic or marine ecosystems (in km²), while we agree with the distinction between ecological and ecosystem restoration (focusing respectively on ecological integrity and on biotic/abiotic resources), a possible improvement would be to introduce

rehabilitated areas, separated from restored areas, to acknowledge any permanently altered conditions without restoring the original state, although a partial or functional improvement has been made. Moreover, the total spatial footprint of operations (e.g. EM-EP-160a.4) could be very difficult to calculate for large international companies. This type of measurement is not yet commonly reported across the industry. Methodologies for consistently calculating disturbed and restored areas vary significantly between jurisdictions and operators, which would make this impractical for companies with diverse global portfolios.

Metrics related to sites (ISSB questions 10(h), 11(g))

31. We note the variability of used terms with relation to site across different standards, such as ‘operating facility’ (EM-EP-140a.6), ‘operational facilities’ (EM-EP-160a.1), or ‘active site’ (EM-EP-160a.4). The interchangeable use of terms ‘operational’, ‘operating’, ‘active’ may lead to ambiguity, particularly with regards to whether infrastructure elements, such as transmission pipelines, manifolds, tanks, or water separation/treatment structures should be included. Moreover, the term ‘operating’ could imply that inactive facilities, whether stopped temporarily or permanently, fall outside the scope of disclosures. Clarifying the terminology would ensure better interoperability and correct interpretation of the requirement. This is noted particularly in the context of the EM-MD-160a.2 metrics that underlines inclusion of facilities for which future operations have been formally announced.

Metrics related to advanced biofuels (ISSB question 12(f))

32. With regards to EM-RM-410a.2, we consider that alignment with EU RED (2009/28/EC) could be improved by revising the definition of ‘advanced biofuels’ to explicitly exclude UCO and Animal Fats Cat. 1 and 2. EU RED classifies ‘advanced biofuels’ as biofuels produced only by feedstocks listed in Annex IX part A. It should also be noted that This SASB disclosure requirement may conflict, or duplicate existing jurisdiction regulated requirements that are in place today.

Other interoperability remarks related to environment

33. We also note the requirement to report water data in megalitres as opposed to other standards like IPIECA or ESRS where the requirement is in cubic meters (m³). This may lead to inconsistency and limited comparability of disclosures. Recommended improvement could be to align units of measure to cubic meters or thousand of cubic meters to support consistency across reporting frameworks.
34. We also bring to attention the use of terms such as ‘reasonably likely’ (CO, MM, EP, MD) which could be seen as potentially ambiguous. This could be further enhanced by proposing evaluation based on established thresholds or likelihood classifications, such as that outlined in the IPCC Guide for Policymakers, which includes clear definitions of terms such as ‘likely’, ‘very likely’ and similar.
35. Furthermore, we note the use of climate-related terms that are not commonly used in the market and may pose questions as to the methodology for their assessment, such as ‘latent’ CO₂ emissions (EM-EP-420a.2). EFRAG also received feedback about limited utility of this metrics for investors. Locked-in emissions, a material issue associated with significant transition risks, are not currently addressed in the standard. As highlighted by the AMF (French Financial Markets Authority), ‘Measuring locked-in emissions involves estimating GHG emissions resulting from the utilisation of assets (infrastructure, production facilities) or long-life products over their lifecycle. Measuring these locked-in emissions is essential for defining the transition strategy of undertakings whose activities are particularly emission-intensive (in sectors such as energy, industry, transport, construction, etc.)’ This issue is particularly relevant for the Oil & Gas Services sector. Such a requirement could adapt, to the long-life products/assets of the O&G Services sector, the following datapoint: EM-EP-420a.2 - Estimated carbon dioxide emissions latent in proved petroleum reserves.
36. With regards to the provisions on water, while impacts on local water conditions can be a driver for significant risks (including litigation and reputation risks) and is mentioned in BC70a ii, this item is absent from the standard. It would be needed to include information on which water basin its operations significantly impact hydrological conditions (e.g. surface water flow, groundwater levels, etc) and what measures are put in place to prevent and mitigate the impacts. With the removal of the definition of deteriorated water, the focus is now on the baseline used for comparison. In that regard, it appears particularly important to keep all previous requirements on how to determine the baseline

sample. Finally, with regards to technical protocols, we note that proposing definition of process water in the technical protocol of EM-EP-140a.2 could improve the understanding of the standard.

37. We note that while the description of the *Greenhouse Gas Emission* topic provided in the Oil & Gas Refining & Marketing standard underlines the importance of process, fugitive, venting and flaring emissions, as well as emissions from non-routine events, the metrics do not capture information related to those releases. It is recommended to ensure consistency between narrative description of topic and disclosures in the standard. It can be noted that metrics proposed in other standards (e.g. EM-EP-110a.1 or EM-EP-110a.4 can be helpful in achieving the alignment.

Social comments

38. The Social topics that have been analysed for the SASB public consultation are detailed below and expand across a number of SASB sectors:
- (a) Human rights (Community relations and indigenous people; operations in conflict areas). These topics would be mapped to ESRS S2 Workers in the Value chain and ESRS S3 Affected communities.
 - (b) Own workforce (Labour practices; Workforce Health and Safety). These topics relate to ESRS S1 Own Workforce.
 - (c) Supply chain management (Social supply chain management; Supply Chain Management). These topics relate to ESRS S2 Workers in the Value Chain and ESRS S3 Affected Communities.
 - (d) Consumer-related topics (Food safety; Health/Nutrition; Product labelling and marketing). These are mapped to ESRS S4 Consumers and end-users.

Social comments – Human Rights

Interoperability Challenges

*Recommend harmonisation of human rights narrative disclosures across the nine standards
ISSB Question 6(c), 9(c), 10(c)*

39. The analysis of the human rights has been performed by EFRAG based on three key themes relevant to human rights: (i) engagement with affected communities, including Indigenous peoples,¹ (ii) (human rights) due diligence, and (iii) Conflict-affected and high-risk area (“CAHRA”). These topics were selected given their inclusion in the ESRS Set 1 (refer to ESRS 1 AR 16) and their connection to internationally recognized human rights instruments.
40. An area where interoperability could be enhanced is to clarify the treatment of human rights due diligence; this is within the context of SASB’s financial materiality approach and the UNGPs’ understanding of human rights due diligence as a “risk to people” process.
41. The key findings related to these disclosures have identified the following key themes:
- (a) Lack of harmonisation on the human rights narrative disclosures across the nine sectors. These are considered sector-agnostic by nature and EFRAG suggests that these could be included across the various sectors in consultation.
 - (b) Definition, clarification and anchoring of the due diligence concept across the sector standards.
 - (c) Role of the IFC performance standards within the SASB standards. An area that could be explored further is in relation to the IFC 7 on Indigenous people that is not referenced in the SASB standards.
42. EFRAG welcomes the amendments to/introduction of disclosures on human rights elements in relation to CAHRA, as well as the consolidation of Indigenous People disclosure topics with Community Relations disclosure topics. EFRAG also welcomes the fact that existing references to due diligence and engagement have been maintained and also complemented in the SASB Draft Standards.

¹ We understand there are few references to workers in the value chain in the provisions of the SASB Draft Standards that we have examined. This topic may be approached in disclosures on human capital, a topic that is beyond the scope of this Note.

43. These human rights elements are consistent with the ESRS which include disclosure on Indigenous People within the standards on affected communities (ESRS S3) and with the fact that due diligence as well as engagement are structuring elements across the ESRS. The disclosures on CAHRA, albeit not explicitly included in the ESRS, were included in the research that was performed Mining, Quarrying and Coal and Oil and Gas that EFRAG worked on in October 2024.²
44. Only some of the nine SASB Draft Standards³ cover some or all of these human rights elements across different disclosure topics. We recognise that issues pertaining to these topics can arise more prevalently in the specific sectors mentioned by SASB; however, limiting them to specific sectors as well as to specific parts of the value chain for O&G may lead to some interoperability challenges. These are in relation to:
 - (a) Misalignment with ESRS and international standards (UNGPs, OECD MNE) which are sector-agnostic and cover the entire value chain on a risk-based approach.
 - (b) Potentially limiting proactive assessment of risks and value chain fragmentation. For companies vertically integrated and operating across multiple O&G subsectors, the lack of alignment between each sectorial standards risks may not provide a full picture of the underlying material risks and opportunities. As for companies operating only in a specific O&G subsector where disclosure on human rights elements is not requested (e.g. Refining & Marketing or Services), it would only provide a limited picture of risks that may rise in the value chain of these companies.
45. We recommend that CAHRA metrics related to communities relations incl. indigenous people, engagement and due diligence are included in the nine sectors SASB Draft Standards, making them sector-agnostic. This approach would streamline reporting for preparers, ensure investors receive a comprehensive and coherent view of risks across value chains, and bring the standards into closer alignment with both soft law and hard law requirements.

Recommend reviewing definitions, clarifying and anchoring due diligence concepts across standards

46. The articulation between these multiple references to due diligence in disclosures as well as metrics related to (i) Community Relations and Rights of Indigenous Peoples; (ii) CARHA; and (iii) Social Supply Chain Management (applicable to the Processed Foods Industry) could be better articulated or even consolidated for all nine SABS Draft Standards. This would facilitate the understanding of these standards and ease reporting for preparers active in several of these sectors. It would also further enhance comparability of information for users.
47. Similarly, a clarification between references to disclosures on due diligence and social impact assessment (SIA) would be welcome. Some SASB Draft Standards require, as part of the metric on “processes used to manage risks and opportunities associated with community rights and interests” that preparers provide information on “use of social impact assessment (SIA) that evaluates, manages and mitigates risks” (EM-CO-210b.1, EM-MM-210b.1, EM-EP-210b.1). In the absence of definition of both due diligence and SIA, preparers as well as users may find it difficult to differentiate clearly the two concepts and what should be reported under one and the other.

ISSB Question 6(d), 9(d), 10(d)

48. SASB metrics contain a limited number of outcome-based elements in relation to engagement, from a financially material standpoint⁴. We invite SASB Draft Standards to also consider such elements. Suggestions could include alignment to EFRAG’s prior research work related to community engagement and free prior and informed consent (FPIC).
49. No explicit reference is given to ‘Security Personnel’, however it is included (indirectly) in coal, construction, metals and mining and O&G EP by way of reference to (i) IFC Performance Standard 4,

² It is also consistent with the provisions of current ESRS that refer to the need for due diligence to explain how it refers to specific activities, business relationships, geographies or other factors that give rise to heightened risk of adverse impacts (ESRS 2 IRO 1 para 53).

³ Coal operations, Construction materials, Iron & Steel producers, Metals & Mining, Oil & Gas – exploration & production, Processed Foods.

⁴ Some metrics relates to “efforts to engage with stakeholders, build consensus and collaborate with communities;” “the frequency of community engagement; the amount invested in community engagement programmes; and shared’ or ‘blended’ value projects that provide quantifiable benefits to the community and the entity.” (EM-CO-210b.1, EM-MM-210b.1, EM-EP-210b.1) However, these metrics may not provide a picture of the actual outcomes both for the preparers and for communities.

Community Health, Safety, and Security; (ii) by way of a simple reference to voluntary on security and HR (VPSHR) that are mentioned in the section covering CAHRA (as a reminder, this section on CAHRA is included in Coal, Metals and Mining, O&G EP). Overall, SASB is proposing application to selected industries and relatively indirect references to security personnel, no metrics per se, but reporting by way of reference to IFC Performance Standards and VPSHR.

ISSB Question 6(c), 9(c), 10(c)

50. EFRAG highlights their prior research work in this area and recommends consideration of ‘Security Personnel’ as a stand-alone topic, to avoid explicit dependency and the risk of potential revisions to the IFC Performance Standards. EFRAG notes that an explicit reference to security personnel metrics, as they are a key risk factor in the context of this issue, as described by the SASB 2014 Industry Brief.
51. EFRAG notes that enhancements on internal consistency and definition of the following concepts could be beneficial and facilitate the interoperability with the ESRS:
 - (a) Supply chain and value chain: concurrence of both concepts and we recommend clarification/definition;
 - (b) Near/in: we recommend consideration of percentage of reserves ‘in’ with regard to the delimitation of CAHRA; and
 - (c) Indigenous people and FPIC: we recommend alignment with ESRS; delimitation on these concepts.

Recommend review of the role of the IFC standards with SASB disclosures

ISSB Question 6(d), 9(d), 10(d)

52. The SASB Draft Standards for Metals & Mining, Oil & Gas Exploration & Production, and Coal Operations (EM-CO-210b.1; EM-MM-210b.1; EM-EP-210b.1) require disclosure on alignment with IFC Performance Standards relating to community relations (Standards 4, 5, and 8).⁵
53. The IFC Standards date from 2012, which may not reflect the latest developments in Business and human rights soft and hard law, as well as various existing standards addressing community relations. In addition, the IFC has announced a revision of its Sustainability Framework, which includes the Performance Standards, scheduled for 2026–2028.⁶ EFRAG welcomes further clarity regarding how SASB is accounting for these parameters.
54. IFC Performance Standard 7 on Indigenous Peoples is not referenced in the SASB Draft Standards. However, some sector-specific SASB Draft Standards include references to Indigenous Peoples and related metrics. Further clarifying why this standard is not referenced would be helpful.

Social comments – Own Workforce

Interoperability Challenges

Recommend review of potential overlap with the development of Human Capital standards

55. The section of own workforce covers both the labour indicators and the health and safety metrics. The key conclusion of this section is that the metrics analysed seem to be of a sector-agnostic nature and be applicable to most of the industries and 100% of those that are under public consultation.
56. Therefore, we note that analysing these metrics whilst the Human Capital standards is under development may present a number of limitations. Given the maturity of the metrics included within Own workforce, the interoperability with ESRS Set 1 could be easily performed given their nature and this has been one of the key aspects covered by our analysis.

⁵ [IFC Performance Standard 4: Community Health, Safety and Security](#); [IFC Performance Standard 5: Land acquisition and involuntary resettlement](#); [IFC Performance Standard 8: Cultural Heritage](#)

⁶ [IFC](#)

Recommend a review of labour practices for application across standards
ISSB Question 6(d), 8(d), 9(d)

57. The analysis of Labour Practices was based on two metrics covering three of the nine industry standards: Coal operations, Iron & Steel, Metals & Mining⁷. The connection of these metrics and the Human capital standard scope is critical. Thus, EFRAG recommends that Labour Practices could be strengthened in several ways:
- (a) Consider ESRS S1 sub-topics such as working conditions, discrimination, diversity;
 - (b) Application of the current set of Labour Practice Metrics to all nine industry standards;
 - (c) Consider sector-specific labour challenges in Extractives to include Just Transition and Worker-Centric Closure Planning. The extractive sector faces distinct labour challenges during mine closures and retrenchment, and while SASB need not adopt the same level of detail as IRMA or IFC, evidence from global frameworks highlights the importance of just transition and worker-centric planning, supporting the case for more comprehensive labour practice requirements across extractive industries; and
 - (d) Align definitions and terms: We recommend using ‘collective bargaining’ and ‘freedom of association’ as universally applicable fundamental rights, as required under ILO Conventions 87 and 98 instead of ‘collective agreements.’
58. EFRAG recommends introducing metrics for ‘workforce health and safety’ and applying these consistently as a sector-agnostic approach. This could include, for example, disaggregation by gender and incident type; expansion of diversity-related metrics to cover equal pay. The ILO’s minimum requirements are enshrined in its core labour conventions which could be the basis for labour related metrics.

Recommend a review of health & safety practices for application across standards
ISSB Question 6(d), 7(d), 8(d), 9(d), 10(d), 11(d), 12(d), 13(d)

59. SASB proposes workplace health and safety metrics related to *number of fatalities, total recordable incident rate (TRIR), and average hours of health, safety and emergency response training* in the proposed drafts metrics across eight industries. Workplace health and safety training EM-EP-320a.1 is only required in the four Oil & Gas industries (EP, RM, SV, MD), Metals & Mining, and Coal Operations. No workplace health and safety metric requirements are proposed in the Processed food industry standard, and EFRAG recommends further review for application across all industries.
60. SASB proposes to delete ‘Near Miss Frequency Rate’ (NMFR). However, EFRAG recommends not deleting entirely from the SASB standards. Retaining NMFR could enhance the decision-usefulness of health and safety disclosures in high-risk sectors and emphasises proactive risk prevention and leading safety indicators. SASB should consider retaining NMFR as per the current industries, additionally providing clear guidance on definitions and methodologies and framing it as a complement to lagging indicators like Total Recordable Incident Rate (TRIR).

ISSB Question 14(c)

61. We note that Health & Safety does not cover all sectors. Disclosures are not required for food processing industry. Persistent risks are noted in the food processing industry. Companies within the sector highlight machine safety and ergonomics as key priority areas and low sector ranking scores point to risks in the sector.⁸
62. Stakeholders from various industries (including Processed Foods) agreed that employee health and safety metrics are essential and should be retained in the SASB standards, noting that omitting them could undermine a fundamental, cross-industry responsibility.

⁷ Some metrics relates to “efforts to engage with stakeholders, build consensus and collaborate with communities;” “the frequency of community engagement; the amount invested in community engagement programmes; and shared’ or ‘blended’ value projects that provide quantifiable benefits to the community and the entity.” (EM-CO-210b.1, EM-MM-210b.1, EM-EP-210b.1) However, these metrics may not provide a picture of the actual outcomes both for the preparers and for communities.

⁸ [Science Direct](#)

63. Based on stakeholder exchanges in the Construction Materials Industry, fatalities remain the most material concern, referencing the Global Cement and Concrete Association (GCCA) Sustainability Guidelines, and that discrepancies exist in fatality definitions across regions, particularly regarding cases involving underlying health conditions.

ISSB Question 6(d), 7(d), 8(d), 9(d), 10(d), 11(d), 12(d), 13(d)

64. In terms of interoperability with ESRS. These metrics are broadly aligned with ESRS. EFRAG recommends considering increased consistency on workplace health and safety metrics such as expanding workplace health and safety training requirements to all industries, and to enhance interoperability. For example:
- (a) EU companies must report workplace accidents and fatalities under national laws aligned with EU directives such as the EU Framework Directive 89/391/EEC on occupational safety and health.
 - (b) The principal adverse indicators (PAI) derived from the EU Sustainable Finance Disclosure Regulation (SFDR); in particular those related to “rate of accidents” and “number of days lost to injuries, accidents, fatalities or illness”.
 - (c) Likewise, the EU Benchmark Regulation contains disclosure requirements related to accidents, injuries, or fatalities.
 - (d) In terms of interoperability with ILO, in June 2022 ILO officially recognized a safe and healthy working environment as the fifth fundamental principle and right at work. This landmark decision obliges all 187 ILO member states to respect, promote, and realize this right, even if they haven't ratified the relevant Conventions.⁹
65. On workforce health and safety (H&S), EFRAG strongly supports its inclusion in the SASB Standard and notes significant alignment with ESRS requirements. Under ESRS S1, companies must report on their H&S policies, targets, and performance, capturing both occupational risks and broader dimensions of well-being. From a European reporting perspective, workplace health and safety is increasingly seen not only as a compliance issue but as a strategic driver of productivity, resilience, and human capital retention.
66. ESRS does not require average hours of health & safety and emergency response training. SASB may include this metric consistently across the various sectors; for example, it is excluded from construction materials and iron & steel draft standards. EFRAG recommends applying the same or similar H&S requirements for all related industries.
67. Workplace Health and safety is a mature topic for industry and can benefit from consistent reporting disclosure requirements as a SASB sector-agnostic Human Capital standard.

Social comments – Supply Chain Management

Interoperability Challenges

Supply Chain Management

Recommend merging ‘Supply Chain Management’ with ‘Social Supply Chain Management’

ISSB Question 7(d), 8(d), 9(d)

68. Supply chain management is a topic that applies to three industries: Metals & Mining, Iron & Steel, and Construction Materials, with a more general narrative disclosure ‘Description of process to manage supply chain risks arising from environmental and social issues.’
69. In line with ESRS S2-1 (paragraph 18), disclosures should also indicate whether the undertaking maintains a supplier code of conduct. EFRAG further suggests narrowing ‘Supply Chain Management’ to social issues and merging it into the broader topic of Social Supply Chain Management to improve coherence and alignment with ESRS requirements, and then to apply consistently across industries, including Processed Foods.
70. Based on exchanges in the Construction Materials Industry, stakeholders noted their intention to report on the proposed supply chain management disclosure. They further stated a preference for

⁹ [ILO](#)

more specific disclosure requirements, such as a supplier code of conduct or modern slavery statement, as examples of relevant disclosures for this industry.

Social Supply Chain Management

Recommend integration of topics: 'Supply Chain Management' and 'Human Rights'

ISSB Question 14(d)

71. Social Supply Chain Management is a topic that applies to only the Processed Foods industry and includes three metrics.¹⁰
72. EFRAG welcomes SASB's focus on 'Social supply chain management.' To enhance interoperability with ESRS, we recommend clarifying the notion of "processes, controls and procedures" and how these elements interrelate, to ensure consistent interpretation and implementation by preparers. We recommend describing the severity and location of risks, the effectiveness of worker engagement, and remediation measures, explicitly integrating the UN Guiding Principles on Business and Human Rights (UNGPs) and OECD guidelines. Further consideration regarding traceability across the value chain is critical, and we suggest a more outcome-oriented metric regarding the process of independent third-party audits to assess the robustness of audits and shortcomings in identifying adverse human rights risks, e.g. child labour.
73. EFRAG recommends further alignment to the topic and disclosure for 'Supply Chain Management' and to be applied across industries. In addition, a question worth raising is whether these metrics should be integrated within the other topics in Social such as Human rights or conceived as a separate layer, given that some of the management responses to human rights risks and opportunities may lay in the supply chain management.
74. Stakeholders in the Processed Foods Industry noted the relevance of qualitative disclosures and their ability to disclose certain quantitative metrics, for example, commodity-sourcing percentages. However, they questioned the added value of the proposed SASB metrics. They emphasised that social and human-rights risks also apply to other labour-intensive sectors and that expanding Social Supply Chain disclosures to other SASB industries could help address existing gaps in SASB and better align with OECD due-diligence expectations.

Social comments – Consumer-related topics

Interoperability challenges

ISSB Question 14(c)

75. EFRAG agrees that consumer-related topics (ESRS S4) are concentrated in SASB's Processed Foods Industry, covering four SASB topics: (a) Product labelling & marketing; (b) Food Safety; (c) Health & Nutrition; and (d) Product Innovation

Recommend review of overlap between SASB and ESRS consumer-related metrics

ISSB Question 14(d)

76. In relation to ESRS interoperability, EFRAG observes a partial overlap between SASB's consumer-related metrics and the ESRS disclosure requirements and company practices. For example, ESRS S4 addresses responsible marketing practices, access to quality information, health and safety, and responsible sourcing. Also, ESRS S4 (linked to ESRS 2, SBM-3, paragraph 10(a)(iv)) requires a description of consumer groups materially affected by a company's operations or value chain, including those vulnerable to health, privacy, or marketing impacts (such as children or financially vulnerable individuals). In addition, ESRS S4-1 (paragraph 13) calls for disclosure of policies to manage material consumer-related IROs, and ESRS 1 (paragraph 63) and ESRS S2-1 (paragraph 14) extend this

¹⁰ SASB metrics: **FB-PF-430c.1:** *Processes, controls and procedures for managing labour conditions and impacts on local communities in the supply chain, including human rights due diligence.*; **FB-PF-430c.2:** *Percentages of sourced commodities certified to internationally recognised standards that trace the path of products through the supply chain.* ; **FB-PF-430c.3:** *Percentage of high-risk suppliers subject to an independent third-party audit or verification in the previous three years, with description of non-conformances and corrective actions.*

focus to value-chain workers and related risks and opportunities across upstream and downstream activities.

77. While Product labelling & marketing is broadly aligned to ESRS, EFRAG encourages SASB to further align its consumer metrics by considering the inclusion of responsible marketing and health and safety, to ensure comparability and to capture investor-relevant health and nutrition impacts more consistently.

Recommend review of overlap between marketing policy, governance and strategy

ISSB Question 14(d) - Product Labelling & Marketing

78. Stakeholders in the Processed Foods Industry noted that they do not market products to children under 16 years of age, in line with their internal marketing standards. Stakeholders highlighted their substantial efforts to restrict advertising to children and to report on those practices and expressed support for including this metric within the SASB standards for the industry.
79. EFRAG notes that SASB's FB-PF-270a.5 metric on marketing policy and governance could benefit from closer alignment with ESRS provisions on consumer impacts and responsible marketing. EFRAG also recommends consideration of the overlap with strategy and governance, and the extent to which this disclosure is already covered.

Recommend further review of vulnerable groups and enhancement of dietary sensitivities

ISSB Question 14(d) - Product Labelling & Marketing

80. For FB-PF-270a.6, a suggestion that may be worth exploring is to review the vulnerable group considerations in addition to children; for example, elderly populations, and dietary sensitivities such as gluten or lactose intolerance, diabetes, and obesity related to marketing practices and product labelling. This could strengthen interoperability with ESRS S4 requirements on responsible marketing and access to quality information, while ensuring that disclosures capture material risks for consumers with specific health or socio-economic vulnerabilities.

Recommend further review of traceability metrics

ISSB Question 14(d) - Food Safety

81. In relation to traceability metrics, SASB proposes metrics related to *recalls, production volume from sites certified to internationally recognised food safety standards, and processes to ensure food safety throughout the value chain*, which are broadly aligned with industry disclosures.
82. EFRAG support SASB's FB-PF-250a.4 metric on recalls and suggests exploring narrative or contextual disclosures, such as cause, corrective actions, geographic locations, fines/penalties, reputational or legal risks.
83. EFRAG supports SASB's FB-PF-250a.6 metric on food safety processes and controls and suggests exploring the traceability dimension. Such disclosures could enhance alignment with supply chain management disclosures and improve interoperability with ESRS requirements on value chain due diligence and risk management.

Recommend review of health & nutrition metrics to consider affordability and accessibility

ISSB Question 14(d) - Health & Nutrition

84. In relation to affordability and accessibility, SASB proposes metrics related to the *strategy for managing health and nutrition attributes, targets to monitor progress, revenues from products, and jurisdictions that require health warning labels*, which are broadly aligned with industry disclosures.
85. EFRAG welcomes SASB's FB-PF-260a.3 metric on managing health and nutrition attributes of the product portfolio and recommends strengthening it with affordability and accessibility dimensions to improve interoperability with ESRS S4 (AR-16) on access to products and services.

Recommend review of Product Innovation topic and any potential overlap with IFRS S1

ISSB Question 14(c)

86. In relation to product innovation, EFRAG recommends ISSB exploring whether innovation would qualify as a sustainability related financial information on its own or a factor to consider when preparing the sustainability related information under IFRS S1. The definition of product innovation and its scope is critical for users' understandability. EFRAG notes that is a critical topic and there are

pros and cons to consider when developing metrics on this topic, given that risks and opportunities may arise from consumer preferences, pricing and supply of ingredients, and social issues in the supply chain, the application of such metric across a wide variety of social topics may need to be further specified if maintained (e.g. food safety, health and nutrition, social supply chain management or even food waste).

87. In the Processed Foods industry, stakeholders noted that their approach integrates health and nutrition in its ESG reporting and that AI supports broader business transformation rather than product-level innovation. Stakeholders stated that qualitative disclosures are most useful at this stage, viewing product innovation as both an opportunity and a form of risk mitigation, while emphasising that it must show clear financial materiality to be considered significant.
88. Overall, there were diverse views on the Product Innovation topic, as certain stakeholders welcomed qualitative disclosures, while other stakeholders considered the proposed topic too narrative and insufficiently clear, noting that their innovation work is mainly focused on health, nutrition, and packaging, and that the draft SASB topic risks overlapping with broader sustainability initiatives rather than providing distinct, industry-specific insight.

Other remarks

Interaction between IFRS Industry-based Guidance and SASB (ISSB question 3(c))

89. The ISSB is proposing to enhance the standards for nine priority industries to assist preparers in identifying climate-related risks and opportunities and improve the decision-usefulness of industry specific information available. EFRAG’s understanding is that it is intended to maintain alignment between the SASB Standards and the Industry-based Guidance on Implementing IFRS S2; therefore, revisions to the SASB Standards will consequently affect the revisions of the IFRS S2 Industry-based Guidance.
90. With regards to *Climate-related content in the SASB Standards*, we support the principle of amending the climate-related content in the priority industries, recognising that this will enhance alignment with IFRS S2 and, consequently, improve interoperability with ESRS E1. In the same way, the lateral amendments of corresponding provisions in other SASB standards, understood as ‘targeted amendments’, are seen as a legitimate step to ensure consistency. However, we are concerned about the current lack of clarity and envisaged interaction of proposed SASB amendments with requirements in IFRS.
91. As stated in the Basis for Conclusions (BC), SASB standards are drafted with objective to ‘not repeat requirements already included IFRS S1 and IFRS S2. For example, the requirement in IFRS S2 for an entity to provide information about greenhouse gas emissions is not repeated in the SASB Standards’. It is assumed that this approach led to decision of not including scope 2 and scope 3 metrics, despite their potential relevance to the sectors. At the same time, the BC underlines that in some instances SASB standards will set out particular disaggregation of IFRS metrics.
92. EFRAG notes a need for conceptual clarification regarding the architecture of the SASB standards. Currently, with regards to climate-related content, we observe the following types of SASB provisions and the way in which they interact with IFRS S2:
 - (a) requirements such as EM-IS-110a.1 (1) to disclose Scope 1 GHG in line with 29(a) of IFRS S2, offering additional sector-specific methodology to do so. The disclosure of Scope 1 reiterates the existing requirement of IFRS S2, 29(a)(i)(1);
 - (b) requirements such EM-IS-110a.1 (2) to disclose the percentage of Scope 1 GHG emissions subject to GHG laws and regulations. This extends the IFRS S2 29(a)(i)(1) by mandating further disaggregation of information (as explained in basis for conclusions);
 - (c) requirements such as EM-IS-110a.2 to disclose targets on Scope 1 GHG emissions. These potentially replicate IFRS S2 (27, 33-35) without providing sector-specific content;
 - (d) requirements such as EM-CO-420a.1 (2.4) ‘For the purposes of this disclosure, the entity shall disclose information about the inputs it used and key assumptions it made in the analysis, consistent with paragraph 22(b) of IFRS S2’, which request to report information already included in IFRS S2 alongside of other data under the metric, without sector-specific methodology.

93. Moreover, it is noted that the inclusion of IFRS S2 metrics, such as gross Scope 1 emissions, appears in some sectors, while being omitted in others (e.g. Processed Foods). This may lead to uncertainty regarding the relevance and applicability of some metrics for industries.
94. Overall, the presentation of content may lead to perception that provisions largely build on existing disclosures of IFRS S2, rather than being a source of guidance as is the intent. In many instances, it could be beneficial to add indicators, references or guidance which more closely reflect the risk and opportunity profile of industries in question, such as the ones EFRAG is proposing elsewhere in this paper.
95. Additionally, EFRAG suggests to explore the interaction of the SASB provisions with the recent IFRS guidance on transition plans¹¹ published in June 2025, which contain examples of disclosures for sectors such as Oil and Gas, or Metals and Mining. This material builds on content developed by TPT (Transition Plan Taskforce) which included disclosure framework and sectoral guidance, for which the IFRS took responsibility in 2024.

Details relevant for Basis for Conclusions

96. As indicated in the summary of this comment letter, EFRAG suggests preparing sufficiently detailed Basis for Conclusions that can improve the understanding of the standard-setting decisions taken and contribute to transparency of the ISSB due process.
97. To foster a clearer understanding of risks and opportunities expected in each industry, it may be helpful if the document presents rationale on why certain topics are not included in the standards, while they are included in others. This can be particularly relevant in relation to:
 - (a) energy management topic in all of the revised oil and gas industry standards;
 - (b) air quality topic in coal operations (in particular, considering earlier SASB reports)¹²;
98. Other provisions not included in the standards, which may raise questions from stakeholders and may merit explanation in the Basis for Conclusions, are the following:
 - (a) sector-specific scope 2 and scope 3 disclosure guidance;
 - (b) metrics related to carbon capture, utilisation and storage (CCUS);
 - (c) metrics related to locked-in emissions, asset divestment and decommissioning;
 - (d) metrics including forward-looking production targets for fossil fuels;
 - (e) intensity metrics reflecting liquefaction and shipping in Oil and Gas - Midstream;
 - (f) metrics on production capacity in or near environmentally sensitive areas
99. Since Oil & Gas is designated as a sector of high criticality under the NIS2 Directive, and cybersecurity-related considerations are already included in several SASB standards¹³ for sectors which are likewise classified as high-criticality sectors under NIS2, EFRAG suggests that the ISSB clarify in the Basis for Conclusions why the Oil & Gas sector was not considered for a dedicated topic and associated metrics on cybersecurity.
100. ISSB could consider providing a brief explanation in the Basis for Conclusions as to why the broader application of Business Ethics, beyond the specific sectors currently covered (OG – EP and SV, and MM), was not considered, given the relevance of these risks across the value chain of extractive sectors. Specifically, EFRAG notes gaps in OG – MD and RM, and CO. For CO in particular, the absence of Business Ethics appears more pronounced, as Operations in Conflict Areas is identified as relevant in the sector, while Business Ethics is not, despite the strong interconnection between these topics as reflected in the topic description.
101. Similarly, ISSB could clarify why metrics on transparency of payments to governments (e.g., public availability of government contracts and disclosure of state aid or financial assistance) were not

¹¹ [IFRS Foundation publishes guidance on disclosures about transition plans](#)

¹² [SASB Standards Outcome Report, 2013 – Coal Operations, Page 27](#)

¹³ Grid Resilience in *Electric Utilities and Power Generators*; Managing Business Continuity and Technology Risks in *Security and Commodity Exchanges*; Data Security in *E-commerce*; and Data Security, Product Security, and Managing Systemic Risks from Technology Disruptions in *Technology and Communications*

included in Business Ethics, despite these issues being highlighted in the topic descriptions and reflected in other international frameworks (GRI and EU Regulations such as 2013/50/EU or 2013/34/EU, and EC Treaty and Regulation 734/2013).

Analysis of industry descriptions

Coal Operations (ISSB question 6(b))

102. We generally agree with sector description, however we note the lack of reference to support services, often provided by external contractors. The existing industry description mentions the standard is 'intended for entities engaged in producing coal and associated products', which suggests that services of exploration, drilling, seismic surveying, and construction may be included. We would recommend making an explicit reference to the in-scope activities, similar to the approach taken in the Metals & Mining SASB standard. We also note that the GRI 12: Coal Sector standard refers to such activities when describing its application.

Construction Materials (ISSB question 7(b))

103. EFRAG considers that the industry description is largely appropriate in capturing the business activities of Construction Materials entities. It correctly identifies the core products (cement, aggregates, glass, brick, etc.) and the typical operational model of vertically integrated production (owning quarries) versus sourcing raw inputs. The description explicitly excludes wood-building products, which is essential to avoid confusion, since the wood products are handled in other standards.

104. We note that the description lists 'plastic materials, insulation, bricks, and roofing material' and could therefore include plastic- and petroleum-based products (e.g., EPS, XPS, polyurethane insulation, roofing felt) that fall outside the scope of mineral-based construction materials as defined in the note. Under the EU's NACE classification, these products are typically classified under Division 22 (Manufacture of plastics products) or Division 19 (Manufacture of coke and refined petroleum products) rather than Division 23 (Manufacture of other non-metallic mineral products). It can be helpful to consider clarifying whether the standard intends to include these non-mineral-based construction products.

105. Further, we also note that the description includes a note that 'Materials producers can operate their own quarries, mine stone, sand or gravel, or source their raw minerals from independent suppliers'. This could cause confusion for operators of standalone stone, sand, or gravel quarries. To avoid ambiguity, a possible improvement could be clarifying whether operating a quarry alone makes an entity a construction materials producer under this standard, or whether only entities that both extract raw materials and process them into finished construction products (e.g., cement, aggregates, bricks) should be considered in scope. It can be noted that the Metals & Mining industry definition may be read as excluding stone quarrying from its scope, further supporting the need to clarify where standalone quarrying activities belong.

Iron and Steel Producers (ISSB question 8(b))

106. We note that the description includes metal service centres and wholesalers within Iron & Steel Producers. Under the EU's NACE classification, such activities (NACE 46.72 - *Wholesale of metals and metal ores*) are distinct from manufacturing (NACE Division 24) and treated as separate wholesale sectors. It would be helpful to clarify the inclusion of distribution and trading activities in the industry description. Although wholesale iron and steel are part of the industry's supply chain, and many iron and steel companies operate their own service centres and distribution networks, including independent wholesalers or steel traders within the same industry definition may be not appropriate. This is particularly because the nature of environmental impacts from independent trading (mainly related to logistics and storage) differs significantly from those of primary or secondary steel production.

107. Additionally, to better reflect the full spectrum of steel production, we consider it can be useful to explicitly include 'long products' (e.g., rebars, beams, and wire rods) in the industry description alongside flat and tubular products. Long products represent a significant share of global steel output and are common terminology used in the industry.

108. We note that while the draft metrics list basic oxygen furnace, conventional electric arc furnace, and hydrogen direct reduction processes, neither the industry description nor subsequent sections clearly

differentiate these three technologies in terms of their distinct environmental impacts. Given their significant differences in emissions and resource use, it may be worth considering describing each steelmaking route's environmental profile in the industry description.

Metals and Mining - (ISSB question 9(b))

109. We note the reference to *quarrying* of stones has been removed from the updated *industry description*, while the Basis for Conclusions does not comment on this change. This may create uncertainty as to whether certain entities engaged in quarrying activities are still within the scope of the standard. Additionally, mention of 'quarries' and 'quarrying' in other ISSB topics (for example, the Construction Materials SASB) could indicate that these activities are not included in the scope, while the 'production of other minerals' could indicate that this activity is in the scope of Metals & Mining SASB. Justifying this amendment in the Basis for Conclusions and ensuring consistency throughout the SASB standards could be a useful revision.
110. The industry definition is also unclear on whether contracted services for mining, such as activities of drilling and blasting, are included in the industry. The reference to 'mining support services' likely points to such entities however a definition, with examples, could be a possible improvement. Entities in this profile can often operate plants located on mining sites to reduce the transport flows and manufacture explosives as close as possible to the mining operation. While located on site, service providers can be exposed to similar industrial hazards, and unintended consequences of the use of their explosives can be equally applied to the service entity and the mining company. Consequently, some of the topics and disclosures of SASB may be relevant for their activity.

Oil and Gas - all 4 standards (ISSB questions 10(b), 11(b), 12(b), 13(b))

111. We generally agree with the industry description and consider it fit for purpose, noting their consistency with sector descriptions of earlier drafts of EFRAG sector standards.

Processed Foods (ISSB question 14(b))

112. Overall, we agree with the industry description in the SASB Standard. It is appropriate and accurate in capturing the business activities of Processed Foods entities. It correctly identifies the core products and includes the manufacturing of prepared foods both for human and animal consumption. It is worth noting however that the proposed amendments to the industry description to include business customers supplied by the industry (namely restaurants, cafeterias, hotels and airlines) differs from the classification approach applied to the Food & Beverage sector by EFRAG based on NACE code classification, where these business-to-business activities were included elsewhere.

Jurisdictional considerations

Coal Operations (ISSB question 6(f))

113. We note that the proposal does not address the current jurisdictional considerations under the Regulation (EU) 2024/1787, which includes provisions related to measurement, monitoring, and reporting of methane emissions from underground and surface coal mines, including active, closed and abandoned sites. Obligations applicable to coal mine operators under this Regulation include ongoing measurement and reporting of vented and flared methane, estimation of post-mining emissions, and the cessation of flaring and venting systems failing to meet specific technical criteria. A possible improvement could include consideration of the requirements under Chapter 4 ('Methane emissions in the coal sector') of the Regulation, potentially as a sub-paragraph of item 3 in EM-CO-110a.3 ('Total Scope 1 methane emissions').

Construction Materials (ISSB question 7(f))

114. We see potential to better consider the provisions of EU Taxonomy Regulation in the standard. This could be done by including metrics with information on how construction products contribute to climate adaptation objectives or reduce embedded emissions in building materials, which are key aspects for demonstrating alignment with EU Taxonomy technical criteria for both mitigation and adaptation goals. This could be done by expanding the disclosure requirements to include information on: 1/ How products contribute to increasing the resilience of buildings and infrastructure to physical climate risks (e.g., fire resistance, flood resilience, heat reflectivity), in line with EU Taxonomy adaptation criteria; or 2/ The measurement and reduction of embedded emissions in construction materials, supporting alignment with EU Taxonomy mitigation objectives.

115. We further note that Regulation (EU) 2024/3110 on the marketing of construction products (updated Construction Products Regulation, CPR) introduces mandatory requirements for disclosing the environmental performance of construction products sold in the EU. This includes the provision of life cycle assessment (LCA)-based data, which must be incorporated into the expanded Declaration of Performance (DoP) and made accessible through the Digital Product Passport (DPP), ensuring integrated and transparent reporting of technical and environmental product information. Consequently, once the CPR requirements are fully implemented, the percentage of products qualifying for credits in sustainable building design and construction certifications (EM-CM-410a.1) will reach 100% for EU-compliant manufacturers. A possible improvement could be to clarify in the standard how this metric should be applied in jurisdictions with mandatory EPD requirements, to ensure comparability.

Metals and Mining (ISSB question 9(f))

116. We note that the current draft of the Metals & Mining SASB Standard does not sufficiently reflect the regulatory developments EU's Critical Raw Materials Act (CRMA), adopted in 2024. The CRMA introduces expectations regarding the diversification of supply sources for strategic raw materials (SRMs), setting an EU-wide benchmark that no more than 65% of any SRM should originate from a single non-EU country. While this benchmark is not binding at the entity level, it strongly informs both public policy and investor expectations across the EU. Given the central role of mining companies in upstream value chains, disclosures on raw material sourcing are material for users of sustainability-related financial disclosures, particularly in Europe.

117. Moreover, the CRMA establishes a benchmark that 15% of the EU's annual consumption of strategic raw materials should come from recycled sources by 2030. Therefore, EFRAG considers that information about the percentage of raw materials sourced from secondary or recycled inputs, and description of the processes used to integrate these materials into primary production, can be particularly relevant.

118. Regulations related to divestment of mining assets guided by the polluter pays (or similar) principle, may also be relevant to consider. This ties financial liability to the remediation of environmental damage in a number of jurisdictions (e.g., Directive 2004/35/EC in the EU; Canadian Environmental Protection Act). Some provisions on site closure are also part of the IED 2.0 Directive (Directive 2024/1785), where the mineral industry is also listed, and of the EWD Directive (Directive 2006/21/EC).

119. With regards to Ecological Impacts in Metals & Mining standards, it is recommended to take into account the New European Directive on soil monitoring.

Oil & Gas – Exploration & Production (ISSB question 10(g))

120. Further consideration may be given to (EU) 2024/1787 that underscores the importance of reporting emissions from both operated and non-operated assets, as well as geographical location of significant flaring or venting and the percentage of routine and non-routine flaring and the efficiency of combustion. In addition, this directive underlines the importance of implementation of Leak Detection & Repair programmes for the industry.

Processed Foods

121. For Packaging Management metrics, a key jurisdictional consideration may be a strong legislative coverage of plastic pollution in the EU. It is recommended to consider whether metrics FB-PF-410a.1 and FB-PF-410a.2 sufficiently capture EU strategies to manage the environmental impact of packaging, with particular attention to plastic, across its lifecycle.