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International Sustainability Standards Board
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Dear Board Members

Consultation on Agenda Priorities

We welcome the opportunity to provide feedback to the International Sustainability Standards Board (ISSB) on the Request of Information consultation on *agenda priorities* (agenda consultation) which will shape the work plan of the ISSB over the next two-years.

This submission collectively represents the voice of 15 peak professional, industry and investor bodies in Australia who have come together to prepare this joint submission on the agenda consultation.

Together, the peak bodies in Australia have members comprising more than 300 companies, 400,000 business and finance professionals, 500 investors with over US\$29 trillion assets under management¹ and represent 7.7 million retail shareholders. We consider clear, transparent, comprehensive and comparable disclosure of sustainability-related information to be part of the foundation of a well-functioning global financial system.

Effective implementation and jurisdictional adoption

We congratulate the ISSB and acknowledge the efforts taken to publish [IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information](#) and [IFRS S2 Climate-related Disclosures](#).

It is now critical that capacity building and support of effective implementation of IFRS S1 and IFRS S2 is prioritised as significant gaps in knowledge, data, capacity and methodologies remain. The ISSB has a leading role to play in working with jurisdictions to ensure global alignment and adoption where possible.

Strategic direction

We recognise that the ISSB may wish to consider research on other sustainability topics in line with the ISSB's mandate and to meet demand from existing and potential investors, lenders and other creditors.

We consider it important for the ISSB to share their strategic direction, including a proposed roadmap and timeline going beyond 2-years, that illustrates the connectivity and potential scope of the eventual suite of ISSB standards. This will assist jurisdictions to adequately prepare, and resource expected future activities, supporting new standard development to achieve global baselines.

Comprehensive global baseline

As the ISSB considers its future work plan, a collaborative and coordinated approach with existing and developing frameworks will be fundamental to achieving international harmonisation and avoid the potential for future fragmentation. In particular, the ISSB will need to engage closely with frameworks

¹ this excludes PRI's signatory base which comprises over 5,000 global signatories with AuM of over USD\$121 trillion.

and jurisdictional initiatives in areas relating to the future research topics identified and with a similar focus on investors. For example, the Taskforce for Nature-related Financial Disclosures and European Sustainability Reporting Standards (ESRS) and how that will interact with IFRS S1 and S2 and any future IFRS Sustainability Disclosure Standards.

Detailed responses to questions

Our detailed responses to key questions in the agenda consultation are included in Appendix A of this submission.

Many of the peak Australian bodies have also made separate submissions, addressing their specific stakeholder views and issues.

Thank you for the opportunity to respond to this consultation. We would be happy to discuss any of our comments in more detail with you. Please contact Karen McWilliams on email karen.mcwilliams@charteredaccountantsanz.com if you have any questions.

The peak Australian bodies who are signatories to this submission (in alphabetical order).

 <p>Australian Banking Association</p> <p>Australian Banking Association</p>	 <p>Australian Institute of Company Directors</p> <p>Australian Institute of Company Directors</p>	 <p>AIRA AUSTRALASIAN INVESTOR RELATIONS ASSOCIATION</p> <p>Australasian Investor Relations Association</p>	 <p>asa Australian Shareholders' Association</p> <p>Australian Shareholders' Association</p>
 <p>Australian Sustainable Finance Institute</p> <p>Australian Sustainable Finance Institute</p>	 <p>bcSD australia</p> <p>Business Council for Sustainable Development Australia</p>	 <p>CHARTERED ACCOUNTANTS AUSTRALIA • NEW ZEALAND</p> <p>Chartered Accountants Australia and New Zealand</p>	 <p>CPA AUSTRALIA</p> <p>CPA Australia</p>
 <p>GROUP OF 100 CFOs building better businesses</p> <p>Group of 100</p>	 <p>Governance Institute of Australia</p> <p>Governance Institute of Australia</p>	 <p>Investor Group on Climate Change</p> <p>Investor Group on Climate Change</p>	 <p>IPA INSTITUTE OF PUBLIC ACCOUNTANTS</p> <p>Institute of Public Accountants</p>
 <p>riaa Responsible Investment Association Australasia</p> <p>Responsible Investment Association Australasia</p>	 <p>UN GLOBAL COMPACT Global Compact Network Australia</p> <p>UN Global Compact Network Australia</p>	 <p>PRI Principles for Responsible Investment</p> <p>UN Principles for Responsible Investment</p>	

Appendix A

Question	Peak Australian Bodies Position
<p>Question 1— Strategic direction and balance of the ISSB’s activities</p>	
<p>Paragraphs 18–22 and Table 1 provide an overview of activities within the scope of the ISSB’s work.</p> <p>(a) From highest to lowest priority, how would you rank the following activities?</p> <p>(i) beginning new research and standard-setting projects</p> <p>(ii) supporting the implementation of ISSB Standards IFRS S1 and IFRS S2</p> <p>(iii) researching targeted enhancements to the ISSB Standards</p> <p>(iv) enhancing the Sustainability Accounting Standards Board (SASB) Standards</p> <p>(b) Please explain the reasons for your ranking order and specify the types of work the ISSB should prioritise within each activity.</p> <p>(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.</p>	<p>(a) It is critical that supporting the effective implementation of IFRS S1 and IFRS S2 is prioritised.</p> <p>(b) IFRS S1 sets the baseline for consideration around future topics and has already incorporated language from the Integrated Reporting Framework. We consider the ISSB should get these fundamentals right, in the absence of a complete conceptual framework prior to addressing future research areas.</p> <p>In particular, the interconnections between the various thematic areas is important and could further leverage the IFRS Integrated Thinking Principles. For example, nature-repair solutions to climate and a just transition to a zero emissions economy are interconnected issues that are being explored through the targeted enhancements.</p> <p>It is unclear how such targeted enhancements will interact with IFRS S1 and IFRS S2 Standards and clarity around this would assist in considering the proposed future research projects. It is important that these enhancements don't just add to the complexity of sustainability reporting, but actually facilitate integrated thinking and decision-making.</p>
<p>Question 2—Criteria for assessing sustainability reporting matters that could be added to the ISSB’s work plan</p>	
<p>Paragraphs 23–26 discuss the criteria the ISSB proposes to use when prioritising sustainability-related reporting issues that could be added to its work plan.</p> <p>(a) Do you think the ISSB has identified the appropriate criteria?</p>	<p>(a) The proposed criteria, as outlined in table 2, are a sound starting position. However, we recommend the reference to investors in criteria 1 is amended to be existing and potential investors, lenders and other creditors to align with the users of ISSB Standards. Further there will be a need for each criterion to be underpinned by a set of principles/considerations. For example, what are the considerations (eg thresholds, if any) for determining the importance of the matter to existing and potential investors, lenders and other creditors (in criteria 1) as there are likely to be multiple issues of equal material</p>

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	<p>weight and the level of importance may change over time and how pervasive or acute the matter is (in criteria 4). Terms such as “pervasive”, “acute” (in criteria 4) and “prevalent” (in criteria 3) will also need to be carefully defined.</p> <p>There are also likely to be differing sets of priority projects for regions, depending upon circumstances. We would like to understand how the ISSB plans to assess these relative priorities. For example, will greater priority be given to jurisdictions which have mandated ISSB Standards or those with larger economies?</p> <p>Referring to paragraph 25 – ‘potential projects added to the workplan is a matter of judgement’, we would like to understand how the ISSB will make this judgement and whether the proposed criteria in Table 2 will be used. It is unclear whether this would include a process, such as this consultation, to obtain feedback from other parties should the issue identified be more complex. While we appreciate the ISSB’s intention to use judgement in adding potential projects to the work plan, we believe there needs to be greater transparency and accountability in this process.</p> <p>Many of the issues identified in the Appendix are complex and longer term, with the issues list only growing. We consider the ISSB will need to both address immediate priorities and maintain a watching brief on longer term issues.</p> <p>The ISSB will also need to have a collaborative approach and coordinate with other initiatives to prevent future fragmentation of sustainability reporting. This is crucial for ensuring the comparability and consistency of sustainability information across different jurisdictions and sectors.</p>
(b) Should the ISSB consider any other criteria? If so what criteria and why?	(b) We also suggest consideration of the maturity of the topic as a possible criterion. This could help ensure that the ISSB’s work plan is focused on areas where it can have the most impact.
Question 3—New research and standard-setting projects that could be added to the ISSB’s work plan	
<p>Paragraphs 27–38 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.</p> <p>(a) Taking into account the ISSB’s limited capacity for new projects in its new two-year work plan, should the ISSB prioritise a</p>	<p><u>(a) Comments on specific proposals</u></p> <p>As expressed in our answer to Question 1, our view that the ISSB’s first priority should be to support the implementation of ISSB Standards IFRS S1 and IFRS S2.</p> <p>While we collectively do not provide a specific ranking for these proposals, we make the following high-level comments:</p>

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<p>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?</p> <p>(i) If a single project, which one should be prioritised? You may select from the four proposed projects in Appendix A or suggest another project.</p> <p>(ii) If more than one project, which projects should be prioritised and what is the relative level of priority from highest to lowest priority?</p> <p>You may select from the four proposed projects in Appendix A or suggest another project (or projects).</p>	<p>Biodiversity, ecosystems and ecosystem services is a growing area of investor interest and is closely connected to climate reporting. Nature-related reporting remains in its nascency. We expect it will evolve rapidly over the coming years, as investor commitments around nature-related impacts are translated into science-based targets; as awareness of nature-related risks and opportunities grows; and as governments seek to implement policies that will support the goals and targets set out in the Kunming-Montreal Global Biodiversity Framework. The release of the TNFD framework in September 2023 will further support uptake of nature-related reporting and associated infrastructure. We feel that more work is needed on the infrastructure – such as reporting metrics and data – to underpin biodiversity reporting. As noted above, it is also critical that the ISSB engages with the TNFD in a collaborative and coordinated way to avoid further fragmentation.</p> <ul style="list-style-type: none"> • Integration in reporting is a similarly important topic, given the growth both in reporting standards and investor expectations. This project would build on the connected information requirements in IFRS S1 and S2, management commentary and the International Integrated Reporting Framework towards establishing a broader corporate reporting framework. Should integration in reporting be pursued, it should be a joint project with the IASB. This approach would not only help to reduce duplication and drive holistic thinking but also ensure that emerging sustainability challenges are adequately addressed in a timely manner– particularly given the potential implications for financial accounting requirements. • Human rights is a key area of interest from both investors and companies looking to manage their regulatory and reputational risks. Some of our signatories have suggested Human capital should be considered collectively with human rights as part of the broader framing of human rights and social issues. While these topics are already being addressed to some extent, there is a need for continuous improvement and innovation in these areas. This should involve developing broad human rights and social issue standards to better reflect the evolving expectations of investors and other stakeholders.
<p><u>Existing Australian sustainability reporting requirements</u></p>	<p>When considering whether a gap exists for existing and potential investors, lenders and other creditors to obtain consistent and comparable information on the topic area, we provide the following information on existing sustainability reporting by Australian entities across a variety of sustainability metrics, both voluntary and mandatory. Below we offer some cross-sectoral examples, noting that individual sectors will also have their own</p>

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	<p>reporting requirements. We have focused on Australian specific disclosures and not wider international frameworks and principles.</p> <ul style="list-style-type: none"> • Environmental disclosures (voluntary): <ul style="list-style-type: none"> ○ Reporting on carbon neutral claims made in line with Climate Active Carbon Neutral Standards and certified through the Climate Active scheme. • Environmental disclosures (mandatory): <ul style="list-style-type: none"> ○ Reporting on GHG emissions, energy production and energy consumption under the National Greenhouse and Energy Reporting Scheme. ○ Climate-related financial risks and opportunities (proposed to be progressively mandated from FY2024-25). • Social disclosures (mandatory): <ul style="list-style-type: none"> ○ Risks of modern slavery in operations and supply chains, and actions to address those risks (mandatory for organisations of a certain size) ○ Gender equality reporting (metrics to be reported on will be expanded for organisations of a certain size from FY24 onwards). • Social disclosures (voluntary) <ul style="list-style-type: none"> ○ Reconciliation Action Plans with First Nations peoples <p>In addition, Australian companies often participate in a variety of survey and ratings processes with global agencies that are significant for their funding. This demonstrates the commitment of Australian businesses to transparency and accountability in sustainability reporting, but also highlights the need for more harmonized and consistent reporting standards.</p>
<p>Question 4—New research and standard-setting projects that could be added to the ISSB’s work plan: Biodiversity, ecosystems and ecosystem services</p>	
<p>The research project on biodiversity, ecosystems and ecosystem services is described in paragraphs A3–A14 of Appendix A. Please respond to these questions:</p> <p>(a) Of the subtopics identified in paragraph A11, to which would you give the highest priority? Please select as many as</p>	<p>(c) Should the ISSB adopt this project, it could leverage existing frameworks and standards including potential learnings the following materials and organisations:</p> <ol style="list-style-type: none"> 1. Task Force on Nature-related Financial Disclosures (TNFD): The TNFD is developing a framework for nature-related financial disclosures, which could provide valuable insights for the ISSB’s project. The TNFD has taken an iterative,

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<p>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:</p> <p>(i) a short description of the subtopic (and the associated sustainability-related risks and opportunities); and</p> <p>(ii) 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.</p> <p>(b) Do you believe that sustainability-related risks and opportunities related to this topic 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? Please explain your reasoning and provide examples of how sustainability-related risks and opportunities related to this topic will either be</p> <p>(i) substantially different or</p> <p>(ii) substantially the same across different industries, sectors or geographic locations.</p> <p>(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?</p> <p>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.</p>	<p>consultative approach to developing its framework. Feedback from or on behalf of organisations that piloted the TNFD framework is publicly available and would provide another valuable information source for the ISSB’s project.</p> <ol style="list-style-type: none"> 2. Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES): IPBES produces authoritative scientific assessments on biodiversity and ecosystem services, which could inform the ISSB's understanding of these topics. 3. Global Reporting Initiative (GRI): GRI's standards include several indicators related to biodiversity, which could serve as a starting point for the ISSB's project. 4. Science Based Targets Network (SBTN): SBTN provides methods and resources for science-based targets (SBTs) for nature for companies and cities. It offers nature-based targets for water, land, ocean, and biodiversity -- progressing towards Sustainable Development Goals (SDGs) and global policy milestones. <p>Draft European Sustainability Reporting Standards (ESRS): E4 Biodiversity and ecosystems specifies disclosure requirements relating to general disclosure requirements, impact, risk and opportunity management as well as metrics and targets related to biodiversity and ecosystems.</p>

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<p>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.</p>	
<p>Question 5—New research and standard-setting projects that could be added to the ISSB’s work plan: Human capital</p>	
<p>The research project on human capital is described in paragraphs A15–A26 of Appendix A. Please respond to the following questions:</p> <p>(a) Of the subtopics identified in paragraph A22, to which would you give the highest priority?</p> <p>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:</p> <p>(i) a short description of the subtopic (and the associated sustainability-related risks and opportunities); and</p> <p>(ii) 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. (b) Do you believe that sustainability-related risks and opportunities related to this topic 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? Please explain your reasoning and provide examples of how sustainability-related risks and opportunities related to this topic will either be</p> <p>(i) substantially different or</p> <p>(ii) substantially the same across different industries, sectors or geographic locations.</p>	<p>(c) Should the ISSB adopt this project, it could leverage existing frameworks and standards including potential learnings the following materials and organisations:</p> <ol style="list-style-type: none"> 1. Global Reporting Initiative (GRI): GRI's standards include several indicators related to human capital, which could serve as a starting point for the ISSB's project. 2. Capitals Coalition: The Capitals Coalition has developed the Natural Capital Protocol and the Social and Human Capital Protocol, which are comprehensive frameworks designed to help organizations identify, measure, and value their direct and indirect impacts and dependencies on natural capital and social and human capital. The Social and Human Capital Protocol, in particular, could provide valuable insights for the ISSB's project. 3. International Labour Organization (ILO): The ILO provides an authoritative framework that ensures provisions of minimum safeguards for workers. 4. Workforce Disclosure Initiative (WDI): The WDI is an investor coalition made up of 68 institutions, with USD\$10 trillion in assets under management. It aims to improve companies’ reporting standards on workforce metrics and provides an online reporting platform for companies to disclose workforce and management data. The WDI system was positively referenced by several investors interviewed for the recent PRI paper What data do investors need to manage human rights risks. 5. Draft European Sustainability Reporting Standards (ESRS): including S1 Own workforce and S2 workers in the value chain which specify disclosure requirements covering working conditions, equal treatment and opportunities and other work-related rights.

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<p>(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.</p> <p>Please explain your choices and the relative level of priority with particular reference to the information needs of investors.</p> <p>You can suggest materials that are not specified. 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</p>	
<p>Question 6—New research and standard-setting projects that could be added to the ISSB’s work plan: Human rights</p>	
<p>The research project on human rights is described in paragraphs A27–A37 of Appendix A. Please respond to these questions:</p> <p>(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:</p> <p>(i) a short description of the subtopic (and the associated sustainability-related risks and opportunities); and</p> <p>(ii) 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.</p> <p>(b) Do you believe that sustainability-related risks and opportunities related to this topic 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</p>	<p>(c) In executing this project, should the ISSB adopt this project, it could leverage existing frameworks and standards including potential learnings the following materials and organisations:</p> <ol style="list-style-type: none"> 1. United Nations Guiding Principles on Business and Human Rights (UNGPs) and the associated UN Guiding Principles Reporting Framework: The UNGPs are the universally accepted global standard for businesses to know and show that they respect internationally recognised human rights. Similarly, the UNGP Reporting Framework is an associated standard that provides investors with a comparable and measurable view of a company’s understanding and management of human rights risks. 2. OECD Guidelines for Multinational Enterprises on Responsible Business Conduct: The OECD Guidelines are recommendations to businesses aimed to encourage positive contributions to economic, environmental, and social process, and to minimise adverse impacts on the matters covered in the Guidelines. The 2023 edition of the Guidelines provides updated recommendations for responsible business conduct across areas such as climate change, technology, business integrity and supply chain due diligence.

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<p>to be tailored to be specific to the industry, sector or geographic location to which they relate?</p> <p>Please explain your reasoning and provide examples of how sustainability-related risks and opportunities related to this topic will either be (i) substantially different or (ii) substantially the same across different industries, sectors or geographic locations.</p> <p>(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.</p> <p>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. 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.</p>	<ol style="list-style-type: none"> 3. United Nations Global Compact (UNGC): The UNGC's Ten Principles include two principles on human rights, which call on businesses to respect human rights and avoid complicity in human rights abuses. 4. World Business Council for Sustainable Development (WBCSD): The WBCSD has developed various resources on human rights, including the CEO Guide to Human Rights, and the Business Commission Tackling Inequality which provides a framework for businesses to respect and support human rights. 5. Capitals Coalition: The Capitals Coalition's Social and Human Capital Protocol could provide valuable insights for the ISSB's project. This Protocol helps organizations understand their relationship with people and societies. 6. Draft European Sustainability Reporting Standards (ESRS): including S2 workers in the value chain, S3 affected communities and S4 consumers/end users which specify disclosure requirements such as working conditions, economic social and cultural rights and social inclusion.
<p>Question 7—New research and standard-setting projects that could be added to the ISSB’s work plan: Integration in reporting</p>	
<p>The research project on integration in reporting is described in paragraphs A38–A51 of Appendix A. Please respond to the following questions:</p> <p>(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?</p>	

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<p>(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)?</p> <p>(i) If you prefer a formal joint project, please explain how you think this should be conducted and why.</p> <p>(ii) If you prefer an ISSB project, please explain how you think this should be conducted and why.</p>	<p>(b) As noted in our response to question 3, we suggest that if the integration in reporting is pursued, it should be a joint project between the IASB and the ISSB.</p> <p>To avoid duplication and fragmentation of reporting and to achieve the goal of a global comprehensive corporate reporting system, connectivity between the two boards and prioritisation to utilise existing standards should be considered. Alignment can only be achieved if knowledge and skills are shared amongst the boards.</p>
<p>(c) In pursuing the project on integration in reporting, do you think the ISSB should build on and incorporate concepts from:</p> <p>(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.</p> <p>(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.</p> <p>(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.</p> <p>(d) Do you have any other suggestions for the ISSB if it pursues the project?</p>	<p>(d) As noted in our response to question 1, we consider it critical for the ISSB to address the interconnectedness of sustainability topics within the application of IFRS S1 and S2. This approach will reduce duplication and foster holistic thinking.</p> <p>We support the project building on and incorporating concepts from the IASB’s Exposure Draft Management Commentary.</p> <p>IFRS S1 sets the baseline for consideration around future topics and has already incorporated language from the Integrated Reporting Framework. It emphasises the importance of integrated thinking and reporting, which can help businesses understand and communicate the interplay between different sustainability topics and financial statements.</p> <p>We also encourage the ISSB to consider the role and use of the Integrated Thinking Principles should it pursue this project.</p>
<p>Question 8—Other comments</p>	
<p>Do you have any other comments on the ISSB’s activities and work plan?</p>	<p>No comment</p>