



7 July 2025

To: **Members of the Hong Kong Institute of CPAs**
All other interested parties

INVITATION TO COMMENT ON THE ISSB EXPOSURE DRAFTS
Proposed Amendments to the SASB Standards
and
Proposed Amendments to the Industry-based Guidance on Implementing IFRS S2
Comments to be received by 14 October 2025

The Sustainability Disclosure Standards Committee (SDSC) of the Hong Kong Institute of Certified Public Accountants (Institute) is seeking comments on the International Sustainability Standards Board (ISSB) Exposure Drafts: *Proposed Amendments to the SASB Standards* and *Proposed Amendments to the Industry-based Guidance on Implementing IFRS S2* (EDs). The EDs are available on the Institute's [website](#).

The ISSB included these enhancements in its 2024–2026 work plan to provide timely support to companies applying IFRS Sustainability Disclosure Standards (ISSB Standards) and to enhance the decision-usefulness of information provided to investors. The ISSB aims to support the high-quality implementation of IFRS S1 *General Requirements for Disclosure of Sustainability-related Financial Information* and IFRS S2 *Climate-related Disclosures* through timely enhancements to the SASB Standards, including a focus on:

- (a) updating them to reflect the **evolution** in the sustainability-related risks and opportunities that entities face in different industries;
- (b) improving **international applicability**;
- (c) improving **connections** between the content in the SASB Standards (and therefore the *Industry-based Guidance on Implementing IFRS S2* (IFRS S2 IBG)¹) and IFRS S1 and IFRS S2; and
- (d) improving **interoperability** and alignment with other sustainability-related standards and frameworks e.g. European Sustainability Reporting Standards, Taskforce on Nature-related Financial Disclosures and Global Reporting Initiative Standards.

The proposed amendments:

- present a comprehensive review of nine industries that were prioritised (all eight industries in the Extractives & Minerals Processing sector and the Processed Foods industry);
- align some metrics in a further 41 industries for topics such as Water Management and Workforce Health & Safety; and
- propose updates to IFRS S2 IBG to maintain alignment with climate-related content in the SASB Standards.

It is important to note that none of the amendments proposed in the EDs would be mandatory. The SASB Standards are distinct and separate from the ISSB Standards, and disclosures in the IFRS S2 IBG are not mandatory.

The SDSC invites your comments on the EDs by **14 October 2025** to allow your comments to be considered in developing its response to the ISSB. Comments should be supported by specific reasoning and should be submitted in written form.

¹ The IFRS S2 IBG is derived from the SASB Standards. When the ISSB issued IFRS S2, it made amendments to the climate-related content in the SASB Standards to maintain alignment between the two sets of materials. The IFRS S2 IBG is therefore largely identical to the climate-related content in the SASB Standards.

Comments may be sent by mail, fax or e-mail to:

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Comments will be acknowledged and may be made available for public review unless otherwise requested by the respondent.