



Project:	Sustainability Reporting	Meeting	AASB November 2022 (M191)
Topic:	ED 321 Feedback summary—overview	Agenda Item:	3.2.1
		Date:	25 October 2022
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		Decision-Making:	None
		Project Status:	Consider feedback from outreach activities

Objective

- 1 The objective of this paper is to provide an overview of the feedback analysis from the Board's recent outreach activities on [ED 321 Request for Comment on ISSB \[Draft\] IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information and \[Draft\] IFRS S2 Climate-related Disclosures](#).
- 2 This paper is for information purposes only and does not ask the Board to make any decisions.

Attachments

- Agenda Paper 3.2.1.1** Staff summaries of preparer-focused roundtables [*Supporting Material – Board only*]
- Agenda Paper 3.2.1.2** Staff summaries of general stakeholder-focused roundtables [*Supporting Material – Board only*]
- Agenda Paper 3.2.1.3** Staff summaries of industry-focused roundtables [*Supporting Material – Board only*]

Background

- 3 In March 2022 the International Sustainability Standards Board (ISSB) published its two initial Exposure Drafts, the comment period for which closed on 29 July 2022:
 - (a) [Exposure Draft on \[Draft\] IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information](#):
 - (i) [Illustrative Guidance on Exposure Draft on \[Draft\] IFRS S1](#); and
 - (ii) [Basis for Conclusions on Exposure Draft on \[Draft\] IFRS S1](#);
 - (a) [Exposure Draft on \[Draft\] IFRS S2 Climate-related Disclosures](#):
 - (i) [Illustrative Guidance on Exposure Draft on \[Draft\] IFRS S2](#);
 - (ii) [Basis for Conclusions on Exposure Draft on \[Draft\] IFRS S2](#); and

(iii) [Appendix B to \[Draft\] IFRS S2—Industry-based disclosure requirements.](#)

4 In April 2022 the Board published ED 321. The comment period closed 15 July 2022. ED 321 provided detail on, and asked stakeholders about, the Australian context for the ISSB’s Exposure Drafts on [Draft] IFRS S1 and [Draft] IFRS S2. ED 321 also asked specifically about the AASB’s proposed approach to developing sustainability-related financial reporting requirements as a separate suite of standards alongside Australian Accounting Standards.

Outreach activities

4 Consistent with the outreach plan considered by the Board at its April 2022 (M186) meeting, staff conducted the following outreach activities to support ED 321:

- (a) **Proactive stakeholder engagement**—one-to-one meetings, meetings with existing AASB advisory committees, general stakeholder roundtables and requesting submissions from sustainability reporting stakeholders;
- (b) **Industry-based outreach**—roundtable discussions with key industries in Australia to specifically discuss the proposed industry-based requirements in Appendix B to [Draft] IFRS S2;
- (c) **Comment letter submissions**—requested formal comment letter submissions from stakeholders;¹ and
- (d) **Survey**—conducted a survey to facilitate engagement with those stakeholders that didn’t have the time or resources to prepare a formal submission to the Board.

Methodology

5 The Board received feedback from more than 200 stakeholders from all sectors and industries including:

- (a) AASB User Advisory Committee;
- (b) AASB-AUASB Sustainability Reporting Project Advisory Panel;
- (c) Chartered Accountants Australia and New Zealand (CAANZ);
- (d) CPA Australia;
- (e) Group of 100 (G100), including representatives from its sustainability committee;
- (f) 12 academics;
- (g) 15 public sector representatives;
- (h) 59 accountants and sustainability reporting experts from 29 listed entities and 10 unlisted entities;
- (i) 21 representatives from accountancy and advisory firms;
- (j) 14 representatives from industry bodies;
- (k) 7 representatives from user bodies;
- (l) Members of other standard-setting bodies; and
- (m) Representatives from other regulators and policy-making bodies.

6 In addition to outreach meetings, the Board received 35 comment letter responses and 17 survey responses. Of the comment letter responses:

- (a) 24 responded to the specific matters for comment in ED 321;

¹ See September 2022 (M190) [Agenda Paper 3.1.2 Submissions to ED 321 and staff summary of survey responses to ED 321](#) for copies of the comment letter submissions and the staff summary of survey responses.

- (b) 18 only provided responses to the ISSB’s Exposure Drafts on [Draft] IFRS S1 and [Draft] IFRS S2 as part of their response to ED 321; and
 - (c) 9 provided a response to both the specific matter for comment in ED 321 and the ISSB’s Exposure Drafts.
- 7 The feedback summaries on ED 321 include all feedback received and/or submitted to the Board, including through engagement in outreach meetings (both one-to-one and group meetings). Consequently, the feedback analyses use the term ‘respondents’ to refer to those stakeholders who attended an outreach meeting and/or submitted a comment letter or survey.
- 8 Respondents did not always comment on every question in ED 321. Consequently, staff have used the terms listed in footnote 2 to describe the proportion of the respondents that commented on a particular question or topic. Appendix A provides a summary of the type of respondent. There were mixed views across the types of respondents, however staff have highlighted any identified trends in responses.²

Structure of feedback summaries

- 9 The Agenda Papers related to feedback analyses have been organised as follows:
- (a) **Agenda Paper 3.2.2 Feedback summary—ED 321 Request for Information on ISSB [Draft] IFRS S1 and [Draft] IFRS S2 (Australian specific questions)**—this paper provides a summary of the feedback received in response to the specific matters for comment in ED 321;
 - (b) **Agenda Paper 3.2.3 ED 321 Feedback summary—ISSB Exposure Draft on [Draft] IFRS S1**—this paper provides a summary of the feedback received on ISSB [Draft] IFRS S1 in response to ED 321; and
 - (c) **Agenda Paper 3.2.4 ED 321 Feedback summary—ISSB Exposure Draft on [Draft] IFRS S2**—this paper provides a summary of the feedback received on ISSB [Draft] IFRS S2 in response to ED 321.

² This paper uses the following terms to describe the extent to which particular feedback was provided by respondents:

<i>Term</i>	<i>Extent of response among respondents</i>
Almost all	all except a very small minority
Most	a large majority, with more than a few exceptions
Many	a small majority or large minority
Some	a small minority, but more than a few
A few	a very small minority

Appendix A—Demographic information of respondents

- A1. Staff received feedback from stakeholders from all sectors and industries. We received 35 comment letter submissions and 17 survey responses to ED 321 (ABA and CAANZ-CPA submitted two separate responses to ED 321 and [Draft] IFRS S1 and [Draft] IFRS S2).

Type of respondent

<i>Type</i>	<i>Number of responses</i>
Preparer	17
User	9
Auditors	7
Academic	6
Standard Setter	2
Other	9
Total	50

Respondents by industry type

<i>Industry</i>	<i>Number of responses</i>
Accountancy	11
Government	7
Academia	6
Industry Body	6
Professional Body	5
Superannuation	3
Insurance	2
Energy	2
Consultancy	2
Industry Body-Banking	1
Industry Body-Insurance	1
Extractive	1
Finance	1
Other	2
Total	50