Australian Government
Australian Accounting Standards Board

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Mr Emmanuel Faber
Chair, International Sustainability Standards Board
Columbus Building, 7 Westferry Circus
Canary Wharf, London E14 4HD, UK

6 July 2026

Submitted via email: commentletters@ifrs.org

Dear Mr Faber,

Feedback on SASB/ED/2026/1 *Proposed Amendments to the SASB Standards and IFRS S2 Industry-based Guidance* ('2026 SASB Exposure Draft')

The AASB recognises that industry-based information plays an important role in sustainability-related and climate-related disclosures. We also remain supportive of the ISSB's objective of improving the international applicability and decision-usefulness of industry-based materials.

However, the AASB considers that the challenges raised by stakeholders in response to SASB/ED/2025/1 *Proposed Amendments to the SASB Standards* and SASB/ED/2025/2 *Proposed Amendments to the Industry-based Guidance on Implementing IFRS S2* ('2025 SASB Exposure Drafts') persist in the 2026 SASB Exposure Draft.

We remain concerned that meaningful engagement with detailed amendments to the SASB Standards requires a combination of IFRS Sustainability Disclosure Standards knowledge, sustainability subject-matter expertise and industry-specific expertise that few stakeholders can bring together within a single consultation process.

We also remain concerned that stakeholders need greater clarity regarding the role, status and future direction of the SASB Standards within the broader architecture of IFRS Sustainability Disclosure Standards and related guidance materials in order to meaningfully contribute to the ISSB's consultation process in the greater context of IFRS S1 and IFRS S2. This includes clarity on whether the SASB Standards are intended to operate as standalone standards or as guidance, how they interact with IFRS S1 and IFRS S2, and how they will interact with future topic-specific standards or similar materials developed by the ISSB, including in relation to nature and human capital.

We refer you to the AASB's submission in response to the 2025 SASB Exposure Drafts and encourage the ISSB to consider those concerns and pause further phases of the Enhancing the SASB Standards project until such matters are deliberated and resolved in consultation with stakeholders, including national standard-setters.

If you require any further information or clarification regarding the AASB's comments, please contact Charis Halliday (challiday@aasb.gov.au) and Lachlan McDonald-Kerr (lmcdonald-kerr@aasb.gov.au), who co-lead the AASB's sustainability reporting team.

Yours sincerely,

Dr Keith Kendall
AASB Chair