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**Exposure Draft: Proposed Amendments to the SASB Standards**

Dear Emmanuel

On behalf of the Deutsches Rechnungslegungs Standards Committee (DRSC) I am writing to comment on the Exposure Draft *Proposed Amendments to the SASB Standards* issued for consultation by the ISSB in July 2025 (herein referred to as 'ED').

The DRSC's Sustainability Reporting Technical Committee strongly supports the ISSB's continuing efforts in developing sustainability reporting standards designed to provide a global baseline, helping individual jurisdictions to build their reporting requirements on them. We therefore also support the envisaged revision of the SASB standards to provide timely support to entities in applying IFRS S1 and IFRS S2. That said, given the lack of future sector-specific ESRS and an increased relevance of the SASB standards for entity-specific disclosures in ESRS reporting (e.g., ED ESRS 1.11), the revised SASB standards will not only be pertinent for reporting in accordance with IFRS S1 but are currently expected to be referred to and considered by a growing number of German and other European entities when developing additional entity-specific disclosures, and we strongly encourage the ISSB to take this into account in both its current and future revision processes.

Based on the discussions in our technical committee and feedback from a number of outreach events with German entities from the nine priority industries, we generally encourage the ISSB to take greater account of the perspective of preparers in the revision process in order to ensure the cost-effectiveness and proportionality of the disclosure requirements laid down in the revised SASB standards. In the same vein, we argue that much greater alignment with the (revised) ESRS should be pursued, and available best practices and/or established industry-specific reporting initiatives should also be given greater consideration. Here, while we acknowledge that recurring and often overlapping revision cycles (e.g., ESRS, GRI, TNFD, GHG Protocol) may hinder interoperability and alignment across different reporting regimes, we would like to advocate at least greater harmonisation of roadmaps and careful coordination between the institutions involved in revising the sustainability-related standards and frameworks.

As a final remark on the ED in advance, we would like to point out to the ISSB that feedback from outreach events with German entities often suggests confusion about whether the

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concept of materiality, as defined in paragraphs 17–19 of IFRS S1, also applies to disclosures prepared in accordance with the SASB standards. Similarly, unclear or ambiguous definitions may in many cases cause application issues and impair both the validity and comparability of sustainability-related information.

Our detailed responses to the questions raised in the ED are laid out in the appendix to this letter. If you would like to discuss our comments further, please do not hesitate to contact me.

Yours sincerely

*Georg Lanfermann*

**APPENDIX: Answers to the questions raised in the ED****Question selection**

This survey contains 15 questions that the ISSB is seeking input on. The first five questions relate to the ISSB's approach to enhancing the SASB Standards. Please select the questions you wish to respond to:

✓	Question 1	Objective
✓	Question 2	Enhancements to interoperability with other standards and frameworks
✓	Question 3	Amendments to the climate-related content in the SASB Standards
✓	Question 4	Information related to biodiversity, ecosystems and ecosystem services and human capital
✓	Question 5	Effective date
✓	Question 6	Coal Operations SASB Standard
✓	Question 7	Construction Materials SASB Standard
✓	Question 8	Iron & Steel Producers SASB Standard
✓	Question 9	Metals & Mining SASB Standard
✓	Question 10	Oil & Gas – Exploration & Production SASB Standard
✓	Question 11	Oil & Gas – Midstream SASB Standard
✗	Question 12	Oil & Gas – Refining & Marketing SASB Standard
✗	Question 13	Oil & Gas – Services SASB Standard
✓	Question 14	Processed Foods SASB Standard
✓	Question 15	Targeted amendments to the SASB Standards

**Question 1—Objective**

- a) Do you agree with the objective of the proposed amendments to the SASB Standards and related areas of focus?

<input checked="" type="checkbox"/>	Agree
<input type="checkbox"/>	Disagree

**DRSC's Response:**

In general, we agree with the ISSB's overarching objective for the revision of the SASB standards as set out, for example, in BC20–BC21—that is, to support entities in applying IFRS S1 and IFRS S2, and to increase the decision-usefulness of sustainability-related information for investors. However, we would like to encourage the ISSB to consider the cost-effectiveness for preparers as an equally important objective in the ongoing revision process.

With regard to the five areas of focus set by the ISSB, as summarised in question 1, we would like to stress that, from a preparer's perspective, enhancing the international applicability of the SASB standards (e.g., in terms of social topics) as well as strengthening interoperability with other sustainability-related standards and frameworks is key.

- b) Do the proposed amendments meet this objective? Why or why not?

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	No

**DRSC's Response:**

Overall, we consider the proposed amendments—i.e., from the revision of industry descriptions to adjustments in terms of specific metrics and technical protocols—to be appropriate for meeting the stated objective. However, we would like to suggest that, as part of the revision process, not only the industry descriptions but also, where appropriate, the underlying industry classifications as identified in SICs should also be revised in order to improve both the applicability of the standards and the cost-effectiveness for preparers. In this regard, it is unclear whether the wording in BC54 (“[...] the ISSB did not identify necessary structural changes to the industry groupings in SICs”) means that no changes will be made, or whether the ISSB will also amend the industry classification under SICs, on a case-by-case basis, if deemed necessary.

More generally, in line with the original development of the SASB standards, an evidence-based approach involving preparers should also be followed by the ISSB in the ongoing revision process in order to identify material industry-specific topics and metrics, and to ensure

the proportionality of the disclosure requirements set out in the revised SASB standards. It follows that any amendments made should always be targeted and focused in nature.

**Question 2—Enhancements to interoperability with other standards and frameworks**

- a) Do you agree with the proposed approach to enhancing interoperability and alignment with other sustainability-reporting standards and frameworks? Why or why not?

✓	Agree
	Disagree

**DRSC's Response:**

In principle, we agree with the approach taken to enhancing interoperability and alignment with other sustainability-related standards and frameworks as summarised in BC35, including four specific criteria to guide the ISSB's consideration of interoperability and alignment in the revision process. However, along the same lines as our response to question 1, we would like to encourage the ISSB to consider the perspective of preparers more explicitly than is currently the case under point (a) of BC35 in order to ensure the proportionality of the disclosure requirements laid down in the revised SASB standards.

- b) Do you agree that the proposed amendments to the nine priority industries and targeted amendments to other SASB Standards will result in improved interoperability and thus achieve the objectives of improving the decision-usefulness of disclosed information for primary users and cost-effectiveness for preparers? Why or why not?

	Agree
✗	Disagree

**DRSC's Response:**

We acknowledge that the amendments proposed by the ISSB would result in greater alignment with GRI and the TNFD recommendations. However, from a German and certainly also from a European perspective, we argue that much greater alignment with the ESRS should be pursued in the ongoing revision process, and recognised industry-specific reporting initiatives (e.g., IPIECA for the oil and gas industry) should also be taken into account to a greater extent by the ISSB in order to improve the cost-effectiveness for preparers. Greater alignment with the (revised) ESRS also appears to be necessary as the relevance of the SASB Standards, based on the EFRAG Drafts of July 2025 (e.g., ED ESRS 1.11), is to be reinforced as part of entity-specific disclosures. Here, the call for interoperability should also be reflected in both the definition and labelling of disclosure topics and metrics (where applicable), which needs to be consistent with other standards and frameworks, in particular ESRS.<sup>1</sup>

<sup>1</sup> Examples include a number of social topics, land use or energy-related disclosures, among others.

The fact that the ESRS, like other referenced sustainability-related standards and frameworks (e.g., GRI, TNFD, GHG Protocol), are to be revised, at least in part, at the same time as the revision of the SASB standards is proceeding therefore could be detrimental to the ISSB's endeavour of enhancing interoperability. As a general remark, given recurring and overlapping revision cycles across the entire sustainability reporting landscape, we would like to point out to the ISSB that, at the time being, it might be difficult to meet the objective of improved interoperability to a reasonable extent. To better address this structural problem and associated second-order effects, we would like to encourage all institutions involved to better coordinate roadmaps and timetables for future revisions.

- c) Could the interoperability and alignment of any disclosure topics or metrics be further enhanced while achieving the objectives of improving the decision-usefulness and cost-effectiveness of the information? What amendments would you propose and why?

✓	Yes
	No

**DRSC's Response:**

See our response to question 2b).

**Question 3—Amendments to the climate-related content in the SASB Standards**

- a) Do you agree that the ISSB should amend the climate-related content in the SASB Standards for the priority industries and make targeted amendments to the climate-related content in the SASB Standards for other industries, as proposed in this Exposure Draft? Why or why not?

<input checked="" type="checkbox"/>	Agree
<input type="checkbox"/>	Disagree

**DRSC's Response:**

We agree with the ISSB's view that, in general, the climate-related content in the SASB standards should not be excluded from the revision process. However, building on our reservations expressed in response to point b) question 2, we argue that it might be premature to amend climate-related disclosures at this point. In any case, we believe that it is vital to closely follow current revisions of the GHG Protocol, and to take material changes into account for amendments to the climate-related content in the SASB Standards, if any.

- b) Do you agree that the proposed amendments would enhance the decision-usefulness of the industry-specific information about climate-related risks and opportunities? Why or why not?

<input checked="" type="checkbox"/>	Agree
<input type="checkbox"/>	Disagree

**DRSC's Response:**

In view of the proposed disclosure requirements for Scope 1 methane emissions (e.g., EM-CO-110a.3, EM-EP-110a.4, EM-MD-110a.3), we would like to emphasise the lack of robust and generally accepted approaches to coping with or measuring methane emissions at both the conceptual and operational level.

As detailed below in our responses to questions 6, 10 and 11, for the three priority industries subject to methane emissions disclosures (i.e., Coal Operations, Oil & Gas—Exploration & Production, Oil & Gas—Midstream), we would like to encourage the ISSB to refer to the European Methane Regulation (Regulation (EU) 2024/1787) as a basis for methane emissions calculations. However, for the remaining SASB standards that are to be revised, we suggest that the ISSB postpones methane emissions disclosure requirements until generally accepted approaches have been established in practice.



- c) Do you agree that the proposed amendments would further clarify how the climate-related content in the SASB Standards and the IFRS S2 industry-based guidance relates to the requirements in IFRS S2?

	Agree
	Disagree

**DRSC's Response:**

No feedback can be provided.

#### Question 4—Information related to biodiversity, ecosystems and ecosystem services and human capital

- a) Do the SASB Standards, including the proposed amendments, enable entities to provide decision-useful information about their BEES-related risks and opportunities to users of general purpose financial reports? Why or why not?

	Yes
	No

#### DRSC's Response:

No feedback can be provided.

- b) In the nine industries that the ISSB has prioritised for enhancement in the Exposure Draft, are there other BEES-related disclosures not addressed through the proposed amendments that would be useful for users of general purposes financial reports in their decision-making? If so, please explain which disclosures and why.

	Yes
	No

#### DRSC's Response:

No feedback can be provided.

- c) Do the SASB Standards, including the proposed amendments, enable entities to provide decision-useful information about their human capital-related risks and opportunities to users of general purpose financial reports? Why or why not?

✓	Yes
	No

**DRSC's Response:**

In general, we welcome the proposed amendments to human capital-related disclosures for the "Labour Practices" and "Workforce Health & Safety" disclosure topics. For example, the proposed amendments to the calculation of the total recordable incident rate (e.g., EM-CO-320a.1, EM-CM-320a.1, EM-IS-320a.1) comply with applicable ESRS requirements and, as a result, are also consistent with current reporting practices. That said, we would like to highlight the issue of significant jurisdiction-specific differences in the legal definition of "recordable incidents", which most likely impairs both the validity (for an entity with operations in different jurisdictions) and the comparability (across entities with operations in different jurisdictions) of disclosed information.

- d) In the nine industries that the ISSB has prioritised for enhancement in the Exposure Draft, are there other human capital-related disclosures not addressed through the proposed amendments that would be useful for users of general purposes financial reports in their decision-making? If so, please explain which disclosures and why.

	Yes
	No

**DRSC's Response:**

No feedback can be provided.

**Question 5—Effective date**

Do you agree with the proposed approach for setting the effective date of the amendments and permitting early application? Why or why not?

✓	Agree
	Disagree

**DRSC's Response:**

Given time needed to prepare for the application of the revised SASB standards—both in terms of necessary adjustments to internal processes and careful consideration of amended disclosure requirements—we agree with the ISSB's proposal to set an effective date that will occur between 12 and 18 months after their issuance. Further, we follow the ISSB's rationale, as set out in BC161, to permit early application to give reporting entities more flexibility in applying the amended disclosure requirements, which in turn may support the timely implementation of IFRS S1.

**Question 6—Coal Operations SASB Standard**

- a) Do you agree with the proposed amendments to the Coal Operations SASB Standard? Why or why not?

	Agree
X	Disagree

**DRSC's Response:**

While we welcome the changes to the Coal Operations standard overall, we see certain areas for improvement (see below).

- b) Do you agree with the Coal Operations industry description, and does it accurately describe the business activities of this industry? Do you agree with the industry classification that forms the basis of this Standard? Why or why not?

	Agree
X	Disagree

**DRSC's Response:**

We understand that the ISSB has already decided to use SIC codes for industry classification. Nevertheless, we encourage the ISSB to reconsider alternative classification systems (such as NACE codes) or to provide a lookup table or accompanying guidance to help firms identify their correct industry, even if they do not currently use SIC codes.

In general, we support clear and unambiguous industry descriptions that enable firms to identify the applicable standard(s) with certainty. Accordingly, it is difficult to assess the industry descriptions of the nine priority sectors in isolation, without understanding any potential changes to other industry descriptions.

For the "Coal Operations" standard, we consider the changes to the industry description useful. However, we note some remaining ambiguity that merits further attention: stakeholder feedback indicates that the terms "coal-based," "typically," and "include" may cause confusion as to whether the industry description applies to certain business models. We encourage the ISSB to consider adopting clearer and less ambiguous language.

As a minor note, the SIC code is missing from the industry description.

- c) Do you agree with the disclosure topics in the Coal Operations SASB Standard? Do they accurately identify the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of entities in this industry?

✓	Agree
	Disagree

#### DRSC's Response:

No further comments are provided.

- d) Do you agree with the metrics and technical protocols in the Coal Operations SASB Standard? Do the metrics help an entity to provide information about sustainability-related risks and opportunities that is useful to primary users in making decisions relating to providing resources to the entity? If not, what would you suggest instead and why?

	Agree
X	Disagree

#### DRSC's Response:

##### Water Management

###### Metric EM-CO-140a.1:

We encourage the ISSB to clarify the definition of water sources to reduce any remaining ambiguity (in particular with respect to third-party water). Furthermore, we believe rainwater should be included in the water sources.

Apart from that, we suggest the ISSB extends the requirement to disclose information about the treatment level of water discharged to provide more information on the ultimate water quality.

Finally, while being equivalent, we believe the term "cubic metres" to be more common than "megalitres" and thus suggest continuing using "cubic metres".

##### Waste & Hazardous Materials Management

###### Metric EM-CO-150a.4:

We suggest clarifying that waste rock does not include tailings.

## Ecological Impacts

### Metric EM-CO-160a.3:

Generally, we support codifying a specific threshold to define the term “near”. However, we are unsure why a 5km radius was chosen and ask the ISSB for further explanation in the Basis for Conclusions. Stakeholder feedback suggests that, particularly in a German and broader European context, a 5 km radius could result in a large number of required disclosures, given, for example, the high density of Natura 2000 sites in some areas.

In addition, we suggest clarifying whether the 5km threshold applies to every direction (i.e., is it meant as a horizontal radius or a three-dimensional sphere around any point of the operation?). Lastly, we encourage the ISSB to assess whether the metric is meaningful for all types of mining (e.g., deep mining).

The comments also apply to all other metrics using the term “near”.

The metric also includes certain examples under point 4 (e.g., the IUCN Protected Areas and the Ramsar Wetlands of International Importance). We suggest emphasizing that these are examples to avoid preparers or auditors mistakenly believing all elements need to be checked to comply. Providing additional implementation guidance may help firms apply the standards consistently, especially with respect to point 3 (definition of an environmentally sensitive location).

### Metric EM-CO-160a.4:

Stakeholder feedback indicates that the definitions used in this metric need to be clearer, particularly those of “area disturbed” and “area restored”. Given the ISSB’s definition of “area disturbed” (“the aggregate geographical area that has been subject to human activity that has changed the condition of the area, relative to an original reference state”) it seems hardly possible to find any area in Germany that is not disturbed, given a long history of settlement and economic activity. Relatedly, it is unclear what reference point should be chosen to decide when an area is considered as restored. We also suggest clarifying what counts as an “operation”.

Overall, we suggest aligning the metric more closely with the ESRS’s “land use” metric.

## Community Relations & Rights of Indigenous Peoples

### Metric EM-CO-210b.1:

Stakeholder feedback indicates that it may be challenging for firms to disclose the frequency of community engagement (point 6.3), not least because there is no universal understanding of what “community engagement” entails. We thus suggest combining point 6.2 and 6.3 into a single, qualitative disclosure describing how the firm manages community engagement.

### Metric EM-CO-210b.2:

We suggest adding some form of contextualization to the metric “number of non-technical delays and the total days idle”, as users of sustainability statements may find it difficult to interpret an aggregated figure in isolation. A useful contextualization could be a breakdown of days by the most significant countries of operation.

## Operations in Conflict Areas

### EM-CO-210c.1 and EM-CO-210c.2:

Stakeholder feedback suggests that the definition of high-risk areas is ambiguous and needs to be specified in order to be applied in practice.

## Labour Practices

### EM-CO-310a.1:

We suggest adding a metric on child labour and forced labour.

## Workforce Health & Safety

### EM-CO-320a.1:

We suggest aligning the definitions of “employees” and “non-employees” more closely with the ESRS.

If the ISSB decides to retain the proposed definition, we recommend removing the term “workers” from the definition.

e) Do you agree with the proposed new metric EM-CO-110a.3 Total Scope 1 methane emissions? Why or why not? If not, what would you suggest instead and why?

	Agree
<b>X</b>	Disagree

## DRSC's Response:

Stakeholder feedback shows that the correct measurement of methane emissions may pose a challenge to firms in the industry and approaches to measure methane emissions may vary. We suggest the ISSB acknowledge the European Methane Regulation (Regulation (EU) 2024/1787) as a basis for calculating methane emissions to harmonise disclosure requirements.



- f) Are there any jurisdictional considerations related to the Coal Operations SASB Standard that have not been addressed in the proposals that should be taken into account? If so, please explain.

✓	Yes
	No

#### DRSC's Response:

Once again, we would like to emphasize that the ESRS are of paramount importance for European firms' sustainability reporting. From a German perspective, closer alignment with the ESRS would therefore be preferable to alignment with the GRI, the TNFD recommendations, or other frameworks.

- g) Do you have any comments on how the proposed amendments will affect the Coal Operations SASB Standard's interoperability and alignment with other sustainability-related standards or frameworks? (Note that the ISSB is focused on providing material information for users about the effects of sustainability-related risks and opportunities on an entity's prospects).

✓	Yes
	No

#### DRSC's Response:

See our response to question 2.

**Question 7—Construction Materials SASB Standard**

- a) Do you agree with the proposed amendments to the Construction Materials SASB Standard? Why or why not?

	Agree
X	Disagree

**DRSC's Response:**

While we welcome the changes to the Construction Materials standard overall, we see certain areas for improvement (see below).

- b) Do you agree with the Construction Materials industry description, and does it accurately describe the business activities of this industry? Do you agree with the industry classification that forms the basis of this Standard? Why or why not?

	Agree
X	Disagree

**DRSC's Response:**

We understand that the ISSB has already decided to use SIC codes for industry classification. Nevertheless, we encourage the ISSB to reconsider alternative classification systems (such as NACE codes) or to provide a lookup table or accompanying guidance to help firms identify their correct industry, even if they do not currently use SIC codes.

In general, we support clear and unambiguous industry descriptions that enable firms to identify the applicable standard(s) with certainty. Accordingly, it is difficult to assess the industry descriptions of the nine priority sectors in isolation, without understanding any potential changes to other industry descriptions.

For the "Construction Materials" standard, we encourage the ISSB to further clarify the industry description. First, it is unclear whether producers of natural stone and gypsum are included. Second, stakeholder feedback indicates that firms in this industry also sell to end users, not only to construction entities or wholesale distributors. Finally, we note that the industry description does not reference recycled materials, even though these are becoming increasingly important across the industry (e.g., cement recyclates).

- c) Do you agree with the disclosure topics in the Construction Materials SASB Standard? Do they accurately identify the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of entities in this industry?

✓	Agree
	Disagree

### DRSC's Response:

No further comments are provided.

- d) Do you agree with the metrics and technical protocols in the Construction Materials SASB Standard? Do the metrics help an entity to provide information about sustainability-related risks and opportunities that is useful to primary users in making decisions relating to providing resources to the entity? If not, what would you suggest instead and why?

	Agree
X	Disagree

### DRSC's Response:

#### Air Quality

##### Metric EM-CM-120a.1:

Stakeholder feedback suggests that it is not common practice in the cement industry to collect data on particulate matter emissions with a particle size of PM2.5. We encourage the ISSB to examine whether firms in the Construction Materials industry can reasonably be expected to comply with the new disclosure requirement.

Furthermore, we suggest clarifying whether pollutants, such as Hazardous Air Pollutants, should be reported as individual pollutants or in aggregate.

#### Water Management

##### Metric EM-CM-140a.1:

We encourage the ISSB to clarify the definition of water sources to reduce any remaining ambiguity (in particular with respect to third-party water). Furthermore, we believe rainwater should be included in the water sources.

Apart from that, we suggest the ISSB extends the requirement to disclose information about the treatment level of water discharged to provide more information on the ultimate water quality.

Finally, while being equivalent, we believe the term “cubic metres” to be more common than “megalitres” and thus suggest continuing using “cubic metres”.

## Ecological Impacts

### Metric EM-CM-160a.2:

Stakeholder feedback indicates that the definitions used in this metric need to be clearer, particularly those of “area disturbed” and “area restored”. Given the ISSB’s definition of “area disturbed” (“the aggregate geographical area that has been subject to human activity that has changed the condition of the area, relative to an original reference state”) it seems hardly possible to find any area in Germany that is not disturbed, given a long history of settlement and economic activity. Relatedly, it is unclear what reference point should be chosen to decide when an area is considered as restored. We also suggest clarifying what counts as an “operation”.

Overall, we suggest aligning the metric more closely with the ESRS’s “land use” metric.

## Workforce Health & Safety

### Metric EM-CM-320a.1:

We suggest aligning the definitions of “employees” and “non-employees” more closely with the ESRS.

If the ISSB decides to retain the proposed definition, we recommend removing the term “workers” from the definition.

## Product Innovation

### Metric EM-CM-410a.1:

We note that it may be challenging for firms to provide a product-level breakdown of revenues from products that reduce environmental impacts, and we would like to caution the ISSB that the disclosure requirement may therefore not result in meaningful disclosures.

## Supply Chain Management

### Metric EM-CM-430a.1:

See below (e).

- e) Do you agree with the proposed addition of the Supply Chain Management disclosure topic and associated metric? If you disagree, which aspects do you disagree with and what would you suggest instead?

<input checked="" type="checkbox"/>	Agree
<input type="checkbox"/>	Disagree

**DRSC's Response:**

While we generally welcome the introduction of the new topic "Supply Chain Management", we have identified room for improvement:

We suggest that the ISSB clarify whether certification or accreditation is required for the raw materials themselves or (only) for their suppliers (point 2). We also note that it may be challenging to collect data on the certification/accreditation status of all raw materials.

Furthermore, we see a need to clarify the definition of "raw materials". For instance, it is unclear whether fuels are included.

We also note that this disclosure requirement may not apply to all firms in the industry as some firms are at the beginning of the supply chain. It is not clear how a firm is expected to comply with the disclosure requirements in such cases.

- f) Are there any jurisdictional considerations related to the Construction Materials SASB Standard that have not been addressed in the proposals that should be taken into account? If so, please explain.

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	No

**DRSC's Response:**

Once again, we would like to emphasize that the ESRS are of paramount importance for European firms' sustainability reporting. From a German perspective, closer alignment with the ESRS would therefore be preferable to alignment with the GRI, the TNFD recommendations, or other frameworks.

- g) Do you have any comments on how the proposed amendments would affect the Construction Materials SASB Standard's interoperability and alignment with other sustainability-related standards or frameworks? (Note that the ISSB is focused on providing material information for users about the effects of sustainability-related risks and opportunities on an entity's prospects.)

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	No

**DRSC's Response:**

See our response to question 2.

## Question 8—Iron & Steel Producers SASB Standard

- a) Do you agree with the proposed amendments to the Iron & Steel Producers SASB Standard? Why or why not?

	Agree
X	Disagree

### DRSC's Response:

While we welcome the changes to the Iron & Steel Producers standard overall, we see certain areas for improvement (see below).

- b) Do you agree with the Iron & Steel Producers industry description, and does it accurately describe the business activities of this industry? Do you agree with the industry classification that forms the basis of this Standard? Why or why not?

✓	Agree
	Disagree

### DRSC's Response:

We understand that the ISSB has already decided to use SIC codes for industry classification. Nevertheless, we encourage the ISSB to reconsider alternative classification systems (such as NACE codes) or to provide a lookup table or accompanying guidance to help firms identify their correct industry, even if they do not currently use SIC codes.

In general, we support clear and unambiguous industry descriptions that enable firms to identify the applicable standard(s) with certainty. Accordingly, it is difficult to assess the industry descriptions of the nine priority sectors in isolation, without understanding any potential changes to other industry descriptions.

As a minor note, the SIC code is missing from the industry description.

Apart from that, we agree with the changes to the industry description.

- c) Do you agree with the disclosure topics in the Iron & Steel Producers SASB Standard? Do they accurately identify the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of entities in this industry?

✓	Agree
	Disagree

### DRSC's Response:

No further comments are provided.

- d) Do you agree with the metrics and technical protocols in the Iron & Steel Producers SASB Standard? Do the metrics help an entity to provide information about sustainability-related risks and opportunities that is useful to users in making decisions relating to providing resources to the entity? If not, what would you suggest instead and why?

	Agree
✗	Disagree

### DRSC's Response:

#### Air Quality

##### Metric EM-IS-120a.1:

It is unclear whether the list of hazardous air pollutants (point 5.2) is exhaustive. We suggest clarifying whether all listed items are mandatory and whether additional pollutants may also be reported.

Furthermore, we suggest clarifying whether pollutants, such as Hazardous Air Pollutants, should be reported as individual pollutants or in aggregate.

#### Water Management

##### Metric EM-IS-140a.1:

We encourage the ISSB to clarify the definition of water sources to reduce any remaining ambiguity (in particular with respect to third-party water). Furthermore, we believe rainwater should be included in the water sources.

Apart from that, we suggest the ISSB extends the requirement to disclose information about the treatment level of water discharged to provide more information on the ultimate water quality.

Finally, while being equivalent, we believe the term “cubic metres” to be more common than “megalitres” and thus suggest continuing using “cubic metres”.

## Labour Practices

### Metric EM-IS-310a.1:

We suggest adding a metric on child labour and forced labour.

## Workforce Health & Safety

### Metric EM-IS-320a.1:

We suggest aligning the definitions of “employees” and “non-employees” more closely with the ESRS.

If the ISSB decides to retain the proposed definition, we recommend removing the term “workers” from the definition.

## Supply Chain Management

### Metric EM-IS-430a.1:

We suggest that the ISSB clarify whether certification or accreditation is required for the raw materials themselves or (only) for their suppliers (point 2). We also note that it may be challenging to collect data on the certification/accreditation status of all raw materials.

Furthermore, we see a need to clarify the definition of “raw materials”. For instance, it is unclear whether fuels are included.

We also note that this disclosure requirement may not apply to all firms in the industry as some firms are at the beginning of the supply chain. It is not clear how a firm is expected to comply with the disclosure requirements in such cases.

- e) Are there any jurisdictional considerations related to the Iron & Steel Producers SASB Standard that have not been addressed in the proposals that should be taken into account? If so, please explain.

✓	Yes
	No

## DRSC’s Response:

Once again, we would like to emphasize that the ESRS are of paramount importance for European firms’ sustainability reporting. From a German perspective, closer alignment with the



ESRS would therefore be preferable to alignment with the GRI, the TNFD recommendations, or other frameworks.

- f) Do you have any comments on how the proposed amendments would affect the Iron & Steel Producers SASB Standard's interoperability and alignment with other sustainability-related standards or frameworks? (Note that the ISSB is focused on providing material information for users about the effects of sustainability-related risks and opportunities on an entity's prospects.)

✓	Yes
	No

**DRSC's Response:**

See our response to question 2.

**Question 9—Metals & Mining SASB Standard**

- a) Do you agree with the proposed amendments to the Metals & Mining SASB Standard? Why or why not?

	Agree
X	Disagree

**DRSC's Response:**

While we welcome the changes to the Metals & Mining standard overall, we see certain areas for improvement (see below).

- b) Do you agree with the Metals & Mining industry description, and does it accurately describe the business activities of this industry? Do you agree with the industry classification that forms the basis of this Standard? Why or why not?

	Agree
X	Disagree

**DRSC's Response:**

We understand that the ISSB has already decided to use SIC codes for industry classification. Nevertheless, we encourage the ISSB to reconsider alternative classification systems (such as NACE codes) or to provide a lookup table or accompanying guidance to help firms identify their correct industry, even if they do not currently use SIC codes.

In general, we support clear and unambiguous industry descriptions that enable firms to identify the applicable standard(s) with certainty. Accordingly, it is difficult to assess the industry descriptions of the nine priority sectors in isolation, without understanding any potential changes to other industry descriptions.

Regarding the specific industry description, we consider it important to clarify that the standard applies only to firms that produce metals as a product in itself, and not to firms that manufacture products made of metal.

Furthermore, we suggest that the ISSB reconsider the removal of “quarrying” from the industry description, especially since it is also listed only as a “can” activity under the “Construction Materials” standard. It is important for firms engaged in quarrying to know unequivocally which standard applies to them.

- c) Do you agree with the disclosure topics in the Metals & Mining SASB Standard? Do they accurately identify the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of entities in this industry?

✓	Agree
	Disagree

#### DRSC's Response:

No further comments are provided.

- d) Do you agree with the metrics and technical protocols in the Metals & Mining SASB Standard? Do the metrics help an entity to provide information about sustainability-related risks and opportunities that is useful to users in making decisions relating to providing resources to the entity? If not, what would you suggest instead and why?

	Agree
✗	Disagree

#### DRSC's Response:

##### Energy Management

###### Metric EM-MM-130a.1:

We note that the metric on natural gas consumed (point 4) is mentioned in the metric title, but the disclosure requirement is not specified in the energy management topic.

##### Water Management

###### Metric EM-MM-140a.1:

We encourage the ISSB to clarify the definition of water sources to reduce any remaining ambiguity (in particular with respect to third-party water). Furthermore, we believe rainwater should be included in the water sources.

Apart from that, we suggest the ISSB extends the requirement to disclose information about the treatment level of water discharged to provide more information on the ultimate water quality.

Finally, while being equivalent, we believe the term "cubic metres" to be more common than "megalitres" and thus suggest continuing using "cubic metres".

## **Waste & Hazardous Materials Management**

### Metric EM-MM-150a.6:

We suggest clarifying that waste rock does not include tailings.

## **Ecological Impacts**

### Metric EM-MM-160a.3:

Generally, we support codifying a specific threshold to define the term “near”. However, we are unsure why a 5km radius was chosen and ask the ISSB for further explanation in the Basis for Conclusions. Stakeholder feedback suggests that, particularly in a German and broader European context, a 5 km radius could result in a large number of required disclosures, given, for example, the high density of Natura 2000 sites in some areas.

In addition, we suggest clarifying whether the 5km threshold applies to every direction (i.e., is it meant as a horizontal radius or a three-dimensional sphere around any point of the operation?). Lastly, we encourage the ISSB to assess whether the metric is meaningful for all types of mining (e.g., deep mining).

The metric also includes certain examples under point 4 (e.g., the IUCN Protected Areas and the Ramsar Wetlands of International Importance). We suggest emphasizing that these are examples to avoid preparers or auditors mistakenly believing all elements need to be checked to comply. Providing additional implementation guidance may help firms apply the standards consistently, especially with respect to point 3 (definition of an environmentally sensitive location).

### Metric EM-MM-160a.4:

Stakeholder feedback indicates that the definitions used in this metric need to be clearer, particularly those of “area disturbed” and “area restored”. Given the ISSB’s definition of “area disturbed” (“the aggregate geographical area that has been subject to human activity that has changed the condition of the area, relative to an original reference state”) it seems hardly possible to find any area in Germany that is not disturbed, given a long history of settlement and economic activity. Relatedly, it is unclear what reference point should be chosen to decide when an area is considered as restored. We also suggest clarifying what counts as an “operation”.

Overall, we suggest aligning the metric more closely with the ESRS’s “land use” metric.

## **Community Relations & Rights of Indigenous Peoples**

### Metric EM-MM-210b.1:

Stakeholder feedback indicates that it may be challenging for firms to disclose the frequency of community engagement (point 6.3), not least because there is no universal understanding of what “community engagement” entails. We thus suggest combining point 6.2 and 6.3 into a single, qualitative disclosure describing how the firm manages community engagement.

### Metric EM-MM-210b.2:

We suggest adding some form of contextualization to the metric “number of non-technical delays and the total days idle”, as users of sustainability statements may find it difficult to

interpret an aggregated figure in isolation. A useful contextualization could be a breakdown of days by the most significant countries of operation.

## Labour Practices

### Metric EM-MM-310a.3:

We suggest keeping the disclosure requirement on child labour and forced labour.

## Workforce Health & Safety

### Metric EM-MM-320a.1:

We suggest aligning the definitions of “employees” and “non-employees” more closely with the ESRS.


If the ISSB decides to retain the proposed definition, we recommend removing the term “workers” from the definition.

## Supply Chain Management

### Metric EM-MM-430a.1:

See below (e).

e) Do you agree with the proposed addition of a Supply Chain Management disclosure topic and associated metric? Why or why not? If not, what would you suggest instead and why?

	Agree
	Disagree

## DRSC’s Response:

While we generally welcome the introduction of the new topic “Supply Chain Management”, we have identified room for improvement:

We suggest that the ISSB clarify whether certification or accreditation is required for the raw materials themselves or (only) for their suppliers (point 2). We also note that it may be challenging to collect data on the certification/accreditation status of all raw materials.

Furthermore, we see a need to clarify the definition of “raw materials”. For instance, it is unclear whether fuels are included.

We also note that this disclosure requirement may not apply to all firms in the industry as some firms are at the beginning of the supply chain. It is not clear how a firm is expected to comply with the disclosure requirements in such cases.

- f) Are there any jurisdictional considerations related to the Metals & Mining SASB Standard that have not been addressed in the proposals that should be taken into account? If so, please explain.

✓	Yes
	No

**DRSC's Response:**

Once again, we would like to emphasize that the ESRS are of paramount importance for European firms' sustainability reporting. From a German perspective, closer alignment with the ESRS would therefore be preferable to alignment with the GRI, the TNFD recommendations, or other frameworks.

- g) Do you have any comments on how the proposed amendments would affect the Metals & Mining SASB Standard's interoperability and alignment with other sustainability-related standards or frameworks? (Note that the ISSB is focused on providing material information for users about the effects of sustainability-related risks and opportunities on an entity's prospects.)

✓	Yes
	No

**DRSC's Response:**

See our response to question 2.

## Question 10—Oil & Gas – Exploration & Production SASB Standard

- a) Do you agree with the proposed amendments to the Oil & Gas – Exploration & Production SASB Standard? Why or why not?

	Agree
X	Disagree

### DRSC's Response:

While we welcome the changes to the Oil & Gas – Exploration & Production standard overall, we see certain areas for improvement (see below).

- b) Do you agree with the Oil & Gas – Exploration & Production industry description, and does it accurately describe the business activities of this industry? Do you agree with the industry classification that forms the basis of this Standard? Why or why not?

✓	Agree
	Disagree

### DRSC's Response:

We understand that the ISSB has already decided to use SIC codes for industry classification. Nevertheless, we encourage the ISSB to reconsider alternative classification systems (such as NACE codes) or to provide a lookup table or accompanying guidance to help firms identify their correct industry, even if they do not currently use SIC codes.

In general, we support clear and unambiguous industry descriptions that enable firms to identify the applicable standard(s) with certainty. Accordingly, it is difficult to assess the industry descriptions of the nine priority sectors in isolation, without understanding any potential changes to other industry descriptions.

Apart from that, we agree with the changes to the industry description.

- c) Do you agree with the disclosure topics in the Oil & Gas – Exploration & Production SASB Standard? Do they accurately identify the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of entities in this industry?

✓	Agree
	Disagree

#### DRSC's Response:

No further comments are provided.

- d) Do you agree with the metrics and technical protocols in the Oil & Gas – Exploration & Production SASB Standard? Do the metrics help an entity to provide information about sustainability-related risks and opportunities that is useful to users in making decisions relating to providing resources to the entity? If not, what would you suggest instead and why?

	Agree
X	Disagree

#### DRSC's Response:

##### Greenhouse Gas Emissions

###### Metric EM-EP-110a.1:

Stakeholder feedback suggests that adding a reference to the concept of materiality, as defined in IFRS S1, would help avoid confusion about whether the concept also applies to disclosures prepared in accordance with the SASB standards, but without simultaneous application of IFRS S1 or S2. We therefore suggest adding a reference to the materiality concept in every SASB standard.

Furthermore, with respect to the disclosure requirement relating to “vehicles used for [...],” we suggest clarifying when emissions should be attributed to one contracting party versus the other (conceptually similar to a transfer of risk) to avoid double counting. For example, do the emissions transfer to the manufacturer of the product, or do they remain with the vehicle owner?

###### Metric EM-EP-110a.2:

We suggest clarifying the definition of “other combustion” to make it more precise. Again, a reference to the concept of materiality would help.



**Metric EM-EP-110a.4:**

Stakeholder feedback shows that the correct measurement of methane emissions may pose a challenge to firms in the industry and approaches to measure methane emissions may vary. We suggest the ISSB acknowledge the European Methane Regulation (Regulation (EU) 2024/1787) as a basis for calculating methane emissions to harmonise disclosure requirements.

**Air Quality****Metric EM-EP-120a.1:**

Stakeholder feedback suggests that it may not be common to collect data on air quality annually, if test results are deemed non-hazardous. However, the disclosure requirement would force firms to collect that data annually and thus may introduce an additional reporting burden. We encourage the ISSB to re-assess the benefits of the disclosure given this stakeholder feedback.

**Water Management****Metric EM-EP-140a.1:**

See below (e).

**Metric EM-EP-140a.3:**

See below (e).

**Metric EM-EP-140a.4:**

See below (e).

**Ecological Impacts****Metric EM-EP-160a.3:**

Generally, we support codifying a specific threshold to define the term “near”. However, we are unsure why a 5km radius was chosen and ask the ISSB for further explanation in the Basis for Conclusions. Stakeholder feedback suggests that, particularly in a German and broader European context, a 5 km radius could result in a large number of required disclosures, given, for example, the high density of Natura 2000 sites in some areas.

In addition, we suggest clarifying whether the 5km threshold applies to every direction (i.e., is it meant as a horizontal radius or a three-dimensional sphere around any point of the operation?). Lastly, we encourage the ISSB to assess whether the metric is meaningful for all types of mining (e.g., deep mining).

The metric also includes certain examples under point 4 (e.g., the IUCN Protected Areas and the Ramsar Wetlands of International Importance). We suggest emphasizing that these are examples to avoid preparers or auditors mistakenly believing all elements need to be checked to comply. Providing additional implementation guidance may help firms apply the standards consistently, especially with respect to point 3 (definition of an environmentally sensitive location).

Finally, we suggest clarifying that the disclosure requirement applies to gas reserves as well, as petroleum is typically understood to be in liquid form.

Metric EM-EP-160a.4:

See below (f).

## **Community Relations & Rights of Indigenous Peoples**

Metric EM-EP-210b.1:

Stakeholder feedback indicates that it may be challenging for firms to disclose the frequency of community engagement (point 6.3), not least because there is no universal understanding of what “community engagement” entails. We thus suggest combining point 6.2 and 6.3 into a single, qualitative disclosure describing how the firm manages community engagement.

Metric EM-EP-210b.2:

We suggest adding some form of contextualization to the metric “number of non-technical delays and the total days idle”, as users of sustainability statements may find it difficult to interpret an aggregated figure in isolation. A useful contextualization could be a breakdown of days by the most significant countries of operation.

## **Workforce Health & Safety**

Metric EM-EP-320a.1:

We suggest aligning the definitions of “employees” and “non-employees” more closely with the ESRS.

If the ISSB decides to retain the proposed definition, we recommend removing the term “workers” from the definition.

In addition, if the ISSB decides to keep the proposed definition, feedback from the Oil & Gas industry suggested clarifying whether “non-employee” workers encompass all contractors working on behalf of the company or a subset, e.g., direct-hire contractors.

Stakeholder feedback from the Oil & Gas industry furthermore suggests the ISSB could consider the “Fatality and Permanent Impairment Injury Rate” instead of the “Total Recordable Incident Rate” as the former is already defined in the “IOGP Fatality and Permanent Impairment Injury definitions”.

## **Climate Resilience**

Metric EM-EP-420a.1:

Stakeholder feedback suggests that price scenarios are typically considered sensitive information and are therefore unlikely to be disclosed (point 2.1). As such, the metric may not be useful.

Stakeholder feedback furthermore suggests that firms may not always know the end-use of their products. It is unclear how the disclosure requirement should be applied in such cases.

## **Management of the Legal and Regulatory Environment**

#### EM-EP-530a.1

In the revised point 6 (new point 2), the entity is now required to disclose whether their stance on influencing regulatory and legislative processes differs from the official stance from its representative industry organisations. This implies that firms must continuously monitor all representative industry organisations. Stakeholder feedback suggests that this may be burdensome and costly.

### **Critical Incident Risk Management**

#### Metric EM-EP-540a.1:

We suggest clarifying the definitions of “lesser consequence” and “greater consequence”, as the disclosure requirement in point 4 refers only to events of “greatest consequence”. It is therefore unclear what is meant by “greater consequence”.

e) Do you agree that the proposed amendments to the Water Management disclosure topic would provide useful information to primary users in a cost-effective manner for preparers?

	Agree
<b>X</b>	Disagree

### **DRSC's Response:**

We encourage the ISSB to clarify the definition of water sources to reduce any remaining ambiguity (in particular with respect to third-party water). Furthermore, we believe rainwater should be included in the water sources.

Apart from that, we suggest the ISSB extends the requirement to disclose information about the treatment level of water discharged to provide more information on the ultimate water quality.

Finally, while being equivalent, we believe the term “cubic metres” to be more common than “megalitres” and thus suggest continuing using “cubic metres”.

We agree with the changes to metric EM-EP-140a.6.

Regarding metrics EM-EP-140a.3 and EM-EP-140a.4, we suggest reviewing whether fracturing-related metrics would fit better under “Hazardous Materials” rather than “Water Management”, since stakeholder feedback indicates that hazardous substances are typically the more significant concern compared with water-management-related issues.

- f) Do you agree with the proposed addition of metric EM-EP-160a.4 (1) Total spatial footprint of operations, (2) area disturbed and (3) area restored and with the content of that metric? Why or why not? If not, what do you recommend and why?

	Agree
X	Disagree

### DRSC's Response:

Stakeholder feedback indicates that the definitions used in this metric need to be clearer, particularly those of “area disturbed” and “area restored”. Given the ISSB's definition of “area disturbed” (“the aggregate geographical area that has been subject to human activity that has changed the condition of the area, relative to an original reference state”) it seems hardly possible to find any area in Germany that is not disturbed, given a long history of settlement and economic activity. Relatedly, it is unclear what reference point should be chosen to decide when an area is considered as restored. We also suggest clarifying what counts as an “operation”.

Overall, we suggest aligning the metric more closely with the ESRS's “land use” metric.

- g) Are there any jurisdictional considerations related to the Oil & Gas – Exploration & Production SASB Standard that have not been addressed in the proposals that should be taken into account? If so, please explain.

✓	Yes
	No

### DRSC's Response:

Once again, we would like to emphasize that the ESRS are of paramount importance for European firms' sustainability reporting. From a German perspective, closer alignment with the ESRS would therefore be preferable to alignment with the GRI, the TNFD recommendations, or other frameworks.

h) Do you have any comments on how the proposed amendments would affect the Oil & Gas – Exploration & Production SASB Standard's interoperability and alignment with other sustainability-related standards or frameworks? (Note that the ISSB is focused on providing material information for users about the effects of sustainability-related risks and opportunities on an entity's prospects.)

✓	Yes
	No

**DRSC's Response:**

See our response to question 2.

## Question 11—Oil & Gas – Midstream SASB Standard

- a) Do you agree with the proposed amendments to the Oil & Gas – Midstream SASB Standard? Why or why not?

	Agree
X	Disagree

### DRSC's Response:

While we welcome the changes to the Oil & Gas – Midstream standard overall, we see certain areas for improvement (see below).

- b) Do you agree with the Oil & Gas – Midstream industry description, and does it accurately describe the business activities of this industry? Do you agree with the industry classification that forms the basis of this Standard? Why or why not?

✓	Agree
	Disagree

### DRSC's Response:

We understand that the ISSB has already decided to use SIC codes for industry classification. Nevertheless, we encourage the ISSB to reconsider alternative classification systems (such as NACE codes) or to provide a lookup table or accompanying guidance to help firms identify their correct industry, even if they do not currently use SIC codes.

In general, we support clear and unambiguous industry descriptions that enable firms to identify the applicable standard(s) with certainty. Accordingly, it is difficult to assess the industry descriptions of the nine priority sectors in isolation, without understanding any potential changes to other industry descriptions.

As a minor note, the SIC code is missing from the industry description.

Apart from that, we agree with the changes to the industry description.

- c) Do you agree with the disclosure topics in the Oil & Gas – Midstream SASB Standard? Do they accurately identify the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of entities in this industry?

✓	Agree
	Disagree

#### DRSC's Response:

No further comments are provided.

- d) Do you agree with the metrics and technical protocols in the Oil & Gas – Midstream SASB Standard? Do the metrics help an entity to provide information about sustainability-related risks and opportunities that is useful to users in making decisions relating to providing resources to the entity? If not, what would you suggest instead and why?

	Agree
✗	Disagree

#### DRSC's Response:

##### Greenhouse Gas Emissions

###### Metric EM-MD-110a.1:

Stakeholder feedback suggests that adding a reference to the concept of materiality, as defined in IFRS S1, would help avoid confusion about whether the concept also applies to disclosures prepared in accordance with the SASB standards, but without simultaneous application of IFRS S1 or S2. We therefore suggest adding a reference to the materiality concept in every SASB standard.

Furthermore, with respect to the disclosure requirement relating to “vehicles used for [...],” we suggest clarifying when emissions should be attributed to one contracting party versus the other (conceptually similar to a transfer of risk) to avoid double counting. For example, do the emissions transfer to the manufacturer of the product, or do they remain with the vehicle owner?

###### Metric EM-MD-110a.3:

See below (e).

## Air Quality

### Metric EM-MD-120a.1:

Stakeholder feedback suggests that it may not be common to collect data on air quality annually, if test results are deemed non-hazardous. However, the disclosure requirement would force firms to collect that data annually and thus may introduce an additional reporting burden. We encourage the ISSB to re-assess the benefits of the disclosure given this stakeholder feedback.

## Ecological Impacts

### Metric EM-MD-160a.3:

Stakeholder feedback indicates that the definitions used in this metric need to be clearer, particularly those of “area disturbed” and “area restored”. Given the ISSB’s definition of “area disturbed” (“the aggregate geographical area that has been subject to human activity that has changed the condition of the area, relative to an original reference state”) it seems hardly possible to find any area in Germany that is not disturbed, given a long history of settlement and economic activity. Relatedly, it is unclear what reference point should be chosen to decide when an area is considered as restored. We also suggest clarifying what counts as an “operation”.

Overall, we suggest aligning the metric more closely with the ESRS’s “land use” metric.

## Workforce Health & Safety

### Metric EM-MD-320a.1:

We suggest aligning the definitions of “employees” and “non-employees” more closely with the ESRS.

If the ISSB decides to retain the proposed definition, we recommend removing the term “workers” from the definition.

In addition, if the ISSB decides to keep the proposed definition, feedback from the Oil & Gas industry suggested clarifying whether “non-employee” workers encompass all contractors working on behalf of the company or a subset, e.g., direct-hire contractors.

Stakeholder feedback from the Oil & Gas industry furthermore suggests the ISSB could consider the “Fatality and Permanent Impairment Injury Rate” instead of the “Total Recordable Incident Rate” as the former is already defined in the “IOGP Fatality and Permanent Impairment Injury definitions”.

## Critical Incident Risk Management

### Metric EM-MD-540a.5:

We suggest clarifying the definitions of “lesser consequence” and “greater consequence”, as the disclosure requirement in point 4 refers only to events of “greatest consequence”. It is therefore unclear what is meant by “greater consequence”.



- e) Do you agree with the proposed addition of metric EM-MD-110a.3 Total Scope 1 methane emissions? Why or why not? If not, what would you suggest instead and why?

	Agree
X	Disagree

#### DRSC's Response:

Stakeholder feedback shows that the correct measurement of methane emissions may pose a challenge to firms in the industry and approaches to measure methane emissions may vary. We suggest the ISSB acknowledge the European Methane Regulation (Regulation (EU) 2024/1787) as a basis for calculating methane emissions to harmonise disclosure requirements.

- f) Are there any jurisdictional considerations related to the Oil & Gas – Midstream SASB Standard that have not been addressed in the proposals that should be taken into account? If so, please explain.

✓	Yes
	No

#### DRSC's Response:

Once again, we would like to emphasize that the ESRS are of paramount importance for European firms' sustainability reporting. From a German perspective, closer alignment with the ESRS would therefore be preferable to alignment with the GRI, the TNFD recommendations, or other frameworks.

- g) Do you have any comments on how the proposed amendments would affect the Oil & Gas – Midstream SASB Standard's interoperability and alignment with other sustainability-related standards or frameworks? (Note that the ISSB is focused on providing material information for users about the effects of sustainability-related risks and opportunities on an entity's prospects.)

✓	Yes
	No

**DRSC's Response:**

See our response to question 2.



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**Question 12—*Oil & Gas – Refining & Marketing* SASB Standard**

No feedback can be provided.

**Question 13—*Oil & Gas – Services* SASB Standard**

No feedback can be provided.

## Question 14—*Processed Foods* SASB Standard

- a) Do you agree with the proposed amendments to the Processed Foods SASB Standard? Why or why not?

	Agree
X	Disagree

### DRSC's Response:

While we generally welcome the changes to the Processed Foods standard, we see certain areas for improvement (see below).

- b) Do you agree with the Processed Foods industry description, and does it accurately describe the business activities of this industry? Do you agree with the industry classification that forms the basis of this Standard? Why or why not?

	Agree
X	Disagree

### DRSC's Response:

As a general remark, we do not find it sufficiently clear when an entity is expected to apply a SASB Standard without applying IFRS S1 and IFRS S2. According to the section "Use of the SASB Standards", "[...] An entity determines which Industry Standard(s) and which disclosure topics are applicable to its business, and which associated metrics to report. Entities with substantial business activities in multiple industries should refer to and consider the applicability of the disclosure topics and associated metrics in multiple SASB Standards." Here, guidance should be included in each standard, what constitutes a "substantial business activity" (e.g., based on a revenue threshold, number of employees, ...).

We understand that the ISSB has decided to use SIC codes for industry classification. Nevertheless, the SIC code is missing from the industry description. Furthermore, we encourage the ISSB to reconsider alternative classification systems (such as NACE codes) or to provide a lookup table or accompanying guidance to help firms identify their specific industry, even if they do not currently use SIC codes.

In general, we support clear and unambiguous industry descriptions that enable firms to identify the applicable standard(s) with certainty. Accordingly, it is difficult to assess the industry descriptions of the nine priority sectors in isolation, without understanding any potential changes to other industry descriptions. With respect to the "Processed Foods" standard, we consider it necessary to clearly distinguish the industry from other, similar industries such as

“Agricultural Products” or “Meat, Poultry & Dairy”. This implies that future industry descriptions in the agricultural sector should be sufficiently precise.

We are unsure why pet foods are included in the standard. We assume this does not cover animal feed used in farming; however, a clarification on this point would be helpful.

The list of inputs mentions “seasoning”; however, we believe the term “condiments” would be more appropriate (as used in the preceding sentence). Furthermore, we suggest removing enhancers from the description, as they are a subgroup of the already listed additives.

We also suggest moving the following important section of the industry description further toward the top: “This SASB Standard is intended for entities engaged in the final stages of the food processing value chain.”

c) Do you agree with the disclosure topics in the Processed Foods SASB Standard? Do they accurately identify the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of entities in this industry?

	Agree
X	Disagree

#### DRSC’s Response:

The topic summary of “Health & Nutrition” mentions “ingredient safety”. In our opinion, “ingredient safety” is more appropriate for the topic “Food Safety”.

It should already be clear from the “Topic Summary” of “Product Labelling & Marketing” that the main focus is on reporting cases of non-compliance with industry or regulatory labelling or marketing codes, and not on reporting that industry or regulatory labelling or marketing codes are being complied with.

On the subject of “Product Innovation”, it is not clear to us what the difference is between an innovation and an improvement. The topic of “product improvement” should be included, as replacing ingredients with environmentally/socially compatible alternatives is not necessarily an innovation (e.g., replacing almonds with less water-intensive nuts or sourcing products from cooperatives or partnerships), but is nevertheless relevant. Reformulations should also be mentioned as an example of this topic. In addition, the “Topic Summary” could mention the reduction of animal ingredients alongside “animal welfare”.

- d) Do you agree with the metrics and technical protocols in the Processed Foods SASB Standard? Do the metrics help an entity to provide information about sustainability-related risks and opportunities that is useful to users in making decisions relating to providing resources to the entity? If not, what would you suggest instead and why?

	Agree
X	Disagree

## DRSC's Response:

### Food Safety

#### Metric FB-PF-250a.4:

Paragraph number 1.5 – Entities should not be required to provide a digital link to every recall notice. Such a general disclosure does not appear to be relevant for users of the information.

If this requirement is to be kept, it should be clarified what the “digital link” should refer to. Such clarification is necessary because, depending on the jurisdiction, there may be a central authority website for recalls, or entities may have to announce recalls themselves. Therefore, in practice, it may not be possible to provide a single “digital link”.

### Health & Nutrition (also Packaging Management, Product Innovation, Environmental Supply Chain Management)

#### Metric FB-PF-260a.3 (also FB-PF-410a.2, FB-PF-410b.1, FB-PF-430b.3):

Paragraph number 4.2 – What is the investment threshold required for disclosure? This should be clarified.

### Product Labelling & Marketing

#### Metric FB-PF-270a.6:

Why is the focus only on children and not on other vulnerable groups as well? Nevertheless, we support the metric.

### Packaging Management (also Water Management, Environmental Supply Chain Management)

#### Metric FB-PF-410a.2 (also FB-PF-140a.3, FB-PF-430b.2):

Paragraph number 2 – What is the definition of “short, medium and long term”? This should be clarified.

## Social Supply Chain Management

### Metric FB-PF-430c.1:

paragraph number 4 – What exactly is meant by “the payment of recruitment fees by workers”? Are these payments made by workers to the entity that employs them? This should be clarified.

If the above refers to payments made by workers to the entity that employs them, it seems questionable whether this is an issue for the “Processed Foods” sector.

- e) Are there any jurisdictional considerations related to the Processed Foods SASB Standard that have not been addressed in the proposals that should be taken into account? If so, please explain.

✓	Yes
	No

### **DRSC’s Response:**

The “Processed Foods” sector is affected by the following taxes, which may be relevant to investors: taxes on sugar (e.g., the United Kingdom and Denmark), taxes on alcohol (e.g., Germany and Denmark) and taxes on plastic (e.g., Spain).

- f) Do you have any comments on how the proposed amendments would affect the Processed Foods SASB Standard’s interoperability and alignment with other sustainability-related standards or frameworks? (Note that the ISSB is focused on providing material information for users about the effects of sustainability-related risks and opportunities on an entity’s prospects.)

✓	Yes
	No

### **DRSC’s Response:**

## Social Supply Chain Management

### Metric FB-PF-430c.1:

Paragraph number 1.1 – Although “workplace safety” is mentioned, occupational accidents should be explicitly mentioned, as this is a relevant metric. In this context, developments relating to the revision of ESRS S1 (ED ESRS S1, Disclosure Requirement S1-13 – Health and Safety metrics) should be taken into account.

**Question 15—Targeted amendments to the SASB Standards**

- a) Do you agree with the proposal to align corresponding metrics in other SASB Standards beyond the nine priority industries to maintain consistent disclosures on these common topics in industries subject to equivalent disclosure requirements? Do you agree that doing so would improve the comparability of information? Why or why not?

	Agree
X	Disagree

**DRSC's Response:**

While we generally agree that aligning the metrics used in the SASB Standards is useful to enhance comparability, we cannot confirm that all affected metrics are appropriate in every case, especially since some industries may have particularities that set it apart from others and would suggest using different or altered metrics. At this point, we do not have sufficient feedback from stakeholders to make a judgment as to whether every metric is fitting for every industry in every case (see also our response to question 15b).

- b) Do you agree that these proposed targeted amendments should be implemented before completing a comprehensive review of each of the SASB Standards affected by these amendments? Do you agree that this approach would support the objective of enhancing the SASB Standards to provide timely support to entities in applying IFRS S1? Why or why not?

	Agree
X	Disagree

**DRSC's Response:**

We held numerous outreach events for stakeholders. Feedback indicates that firms in industries affected *only* by the targeted amendments are largely unaware of the proposed changes to their SASB Standards. Following, at this stage, we do not have sufficient input across all affected industries to make a well-founded judgment regarding the appropriateness of the changes. Overall, we argue that firms should be given an explicit opportunity to diligently review any changes to their SASB standards, and we do not consider it useful to introduce amendments without proper consultation. Therefore, at the very least, we deem it necessary that all changes which are now to be implemented as part of the targeted amendments will be clearly flagged in future consultations, and that these changes will also be subject to proper consultation in due course.



As such, we are unable to answer questions 15c) to 15i).

c) Do you agree with the proposed targeted amendments associated with greenhouse gas emissions? Why or why not?

	Agree
	Disagree

See our responses to questions 15a) and 15b).

d) Do you agree with the proposed targeted amendments associated with energy management? Why or why not?

	Agree
	Disagree

See our responses to questions 15a) and 15b).

e) Do you agree with the proposed targeted amendments associated with water management? Why or why not?

	Agree
	Disagree

See our responses to questions 15a) and 15b).

f) Do you agree with the proposed targeted amendments associated with labour practices? Why or why not?

	Agree
	Disagree

See our responses to questions 15a) and 15b).

g) Do you agree with the proposed targeted amendments associated with workforce health and safety? Why or why not?

	Agree
	Disagree

See our responses to questions 15a) and 15b).

h) Are the proposed targeted amendments to the additional 41 industries appropriate and relevant for the individual SASB Standards? Are there any jurisdictional considerations related to these SASB Standards that have not been addressed in the proposals for targeted amendments that should be taken into account? If so, please explain.

	Yes
	No

See our responses to questions 15a) and 15b).

i) Do you agree that the proposed targeted amendments to the SASB Standards would enhance the interoperability and alignment with other sustainability-reporting standards and frameworks? Why or why not? (Note that the ISSB is focused on providing material information for users about the effects of sustainability related risks and opportunities on an entity's prospects.)

	Agree
	Disagree

See our responses to questions 15a) and 15b).