

International Sustainability Standards Board  
Columbus Building  
7 Westferry Circus  
Canary Wharf  
London  
E14 4HD

28 November 2025

Dear ISSB Board members,

## **Invitation to comment – Exposure Draft of Proposed Amendments to the Industry-based Guidance on Implementing IFRS S2**

Ernst & Young Global Limited, the central coordinating entity of the global EY organisation, welcomes the opportunity to offer its views on the International Sustainability Standards Board's (ISSB or the Board) Exposure Draft of Proposed Amendments to the Industry-based Guidance on Implementing IFRS S2 (IFRS S2 industry-based guidance).

We appreciate the opportunity to provide our comments on the proposed amendments to the IFRS S2 industry-based guidance. We support the ISSB's proposal to maintain alignment between IFRS S2 industry-based guidance and SASB Standards. We believe that alignment ensures a coherent global baseline for climate-related disclosures.

A summary of our response to the questions are set out in the Appendix to this letter. Should you wish to discuss the contents of this letter with us, please contact Michiel van der Lof at the above address, or on +44 (0) 20 7951 3152.

Yours faithfully

*Ernst & Young Global Limited*

## Appendix – Responses to specific questions in the Exposure Draft of Proposed Amendments to the IFRS S2 industry-based guidance

### Question 1—Consequential amendments to the IFRS S2 industry-based guidance

The ISSB proposes to make consequential amendments to the IFRS S2 industry-based guidance when it makes amendments to the SASB Standards in order to maintain alignment between the IFRS S2 industry-based guidance and the climate-related content in the SASB Standards.

Paragraphs BC11–BC14 of the Basis for Conclusions describe the reasons for this proposal.

Do you agree that the ISSB should make consequential amendments to the IFRS S2 industry-based guidance when it makes amendments to the SASB Standards as set out in the SASB exposure draft? Why or why not?

We support making consequential amendments to the IFRS S2 industry-based guidance when changes are made to the SASB Standards, as outlined in the SASB exposure draft. We believe that maintaining alignment between the IFRS S2 industry-based guidance and the climate-related content in the SASB Standards is essential. We also believe that any divergence between these frameworks could lead to confusion for preparers and users, reduce comparability, and increase compliance costs. We acknowledge that ensuring alignment provides a consistent global foundation for climate-related disclosures.

### Question 2—Effective date

The ISSB proposes to set an effective date for the consequential amendments that is the same as the effective date of the corresponding amendments to the SASB Standards.

The ISSB proposes that the effective date be 12–18 months after the amendments are issued and to permit early application.

Paragraph BC15 of the Basis for Conclusions describes the reasons for this proposal.

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

We agree with the proposal to align the effective date of the consequential amendments to the IFRS S2 industry-based guidance with the corresponding amendments to the SASB Standards. We also agree to set the effective date of the consequential amendments to the IFRS S2 industry-based guidance for between 12 and 18 months after the amendments are finalised and issued, to allow preparers time to prepare for changes in the IFRS S2 industry-based guidance. We also agree that early application should be permitted.