

August 24, 2023

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

Re: Request for Information – Consultation on Agenda Priorities

Dear International Sustainability Standards Board:

Chartered Professional Accountants of Canada (CPA Canada) appreciates the opportunity to comment on the International Sustainability Standards Board's (ISSB) Request for Information – Consultation on Agenda Priorities (Request for Information).

CPA Canada is one of the largest national accounting organizations in the world, representing more than 220,000 members. It works collaboratively with the provincial, territorial and Bermudian CPA bodies, as it represents the Canadian accounting profession, both nationally and internationally. This collaboration allows the Canadian profession to champion best practices that benefit business and society, as well as prepare its members for an ever-evolving operating environment. CPA Canada actively supports the independent structure of accounting, audit and assurance, and sustainability standard setting in Canada and conducts research on emerging business issues. Responses to the Request for Information will also be submitted by the Canadian Accounting Standards Board and Canadian Sustainability Standards Board.

We commend the ISSB for the significant and timely progress it has made since formation, particularly with the issuance of its first two disclosure standards – IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information (IFRS S1) and IFRS S2 Climate-related Disclosures (IFRS S2). The Canadian accounting profession has supported the ISSB since its inception including facilitating Canada's successful bid to establish the ISSB Centre in Montreal. However, we also recognize that there is a vast amount of work to do to standardize and enhance sustainability reporting globally. Over the next two years, we recommend that the ISSB prioritize the effective implementation of IFRS S1 and IFRS S2. As an active member of the IFRS Foundation's Partnership for Capacity Building, we are proud to continue our collaboration with the ISSB and contribute to the development of resources to support the high-quality implementation of IFRS Sustainability Disclosure Standards in Canada and globally.



In developing our response, we conducted extensive outreach with a wide variety of interested and affected parties, including but not limited to, preparers, investors, directors, auditors, industry associations, and academics. We also consulted with CPA Canada's Sustainability Reporting Advisory Committee and Sustainability Preparers Working Group which are comprised of experts in sustainability, financial reporting, and capital markets issues.

**This cover letter summarizes our key messages in response to the Request for Information. Our responses to select questions from the Request of Information are included in the Appendix to this letter.**

### **Clarity on longer-term vision of the ISSB**

Given the breadth and depth of potential work that could be done by the ISSB, there is a need for clarity on the longer-term vision for the ISSB's work beyond the next two years. This includes providing insight on what the full suite of ISSB topic-specific sustainability disclosure standards may encompass. We are hearing repeatedly that it is unclear what the longer-term vision of the ISSB is. Without knowing this, preparers and others may be less willing to commit to adoption of ISSB standards. The ISSB should communicate with as much specificity as possible what the "end-game" is for its work.

It will also be important to establish the architecture for the future topic-specific standards. In that regard, we support bringing industry-specific requirements formally into the ISSB's standards given that industry-specific considerations are an integral part of reporting on sustainability-related risks and opportunities. We do not have any significant concerns with ISSB's proposed methodology for enhancing the international applicability of the Sustainability Accounting Standards Board (SASB) Standards as outlined in the [Exposure Draft](#) issued earlier this year and, as such, we are generally supportive of the proposal.

It would also be helpful for the ISSB to communicate how it will be monitoring the adoption of the existing standards as part of its implementation support activities. This monitoring will help determine the extent to which the ISSB is meeting its objective of developing a global baseline of sustainability disclosures. Additionally, over the medium to long-term, we recommend that the ISSB establish an interpretations committee to consider and make decisions on areas of the standards that require clarification which will enable a common understanding and consistent application of the standards.

### **Focus on effective implementation of IFRS S1 and IFRS S2**

We have consistently heard that the priority for the ISSB over the next two years should be capacity building and providing substantial implementation support for IFRS S1 and IFRS S2. Effective and consistent implementation of these first two standards will be critical to developing the credibility of the standards needed to encourage adoption by local regulators and voluntary market adoption, as well as to lay the foundation for future standards of the ISSB.

We have heard significant concerns from preparers regarding the burden of complying with different jurisdictional sustainability reporting requirements. We believe that the ISSB has an important role to play in



addressing interoperability issues and that it should continue its work with regulators around the world in this area.

While climate has understandably been selected as the first topic-specific standard, it may be one of the most challenging topics for preparers to address. In particular, developing a scenario analysis and reporting on greenhouse gas emissions (especially Scope 3 emissions) are both expected to be difficult. Additionally, conducting a materiality assessment in the context of sustainability reporting is expected to be challenging given many issuers have little experience. There is a need for significant implementation support for issuers in the form of detailed guidance and examples of the types of disclosures that would meet the disclosure standards, especially for scenario analysis.

There is a need for clarity and guidance on applicability of the proportionality measures in the standards. For example, how to assess “undue cost and efforts” as a rationale for reduced disclosures in the various instances where it is permitted in the standards. While we recognize that this concept is used already in the financial reporting context, there is not a common understanding of how to apply it in the context of sustainability reporting, so further guidance is needed in this area for the mechanism to be appropriately applied.

### **Research and new standards setting projects - continuing momentum**

While the primary focus of the ISSB should be implementation support for IFRS S1 and IFRS S2, we are supportive of the ISSB continuing with the momentum that has been established by conducting some incremental research on other sustainability topics. Ultimately, the ISSB will need to determine the resources that it has available to allocate to these various initiatives, considering areas of priority.

All three sustainability topics proposed by the ISSB for future research – biodiversity, ecosystems, and ecosystem services; human capital; and human rights – are relevant and important. It is challenging to rank the topics as their relative importance may vary in different contexts and depending on variety of factors such as geographic location, industry, etc. On balance, when soliciting feedback on how the ISSB should rank its future work on these three topics, biodiversity emerged as the most commonly supported topic for the next phase of research.

### **Connectivity and integration in reporting**

Ensuring connectivity between the ISSB and International Accounting Standards Board’s (IASB) respective requirements is important. We heard that connectivity in reporting is a priority, but fully integrated reporting may be too ambitious in the short term. We believe that integration in reporting should be a longer-term objective for the ISSB. There is a need for education and clarity on what integration in reporting means as this is a new concept for many. Any future project on integration in reporting should be pursued as a joint project between the ISSB and IASB.



## Conclusion

We strongly support the work of the ISSB and recognize the significant effort that has gone into developing the first two disclosure standards. It is critical that the ISSB prioritize support for the implementation of these standards as its primary area of focus in its next two-year work plan. In determining incremental areas of work in the near term, we encourage the ISSB to consider what is realistically feasible for itself and the market. There is a need for careful consideration of the ability for interested and affected parties to meaningfully contribute to research efforts and provide feedback on any new proposals, as they concurrently work to understand, build capacity, and properly implement the standards that have been issued.

Thank you for the opportunity to comment on the Request for Information. We hope that our comments and suggestions will help the ISSB to determine its agenda priorities for the next two years. We would be pleased to share further insights and answer any questions you may have. Please contact Rosemary McGuire, Vice President, Research, Guidance and Support ([rmcguire@cpacanada.ca](mailto:rmcguire@cpacanada.ca)).

Yours truly,

A handwritten signature in black ink, appearing to read "Pamela Steer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Pamela Steer, FCPA, FCA  
President & CEO



## **Appendix**

The following are our responses to select questions posed in the ISSB's Request for Information – Consultation on Agenda Priorities.

### **Question 1 – Strategic direction and balance of the ISSB's activities**

Paragraphs 18 – 22 and Table 1 provide an overview of activities within the scope of the ISSB's work.

- a) From highest to lowest priority, how would you rank the following activities?
  - (i) beginning new research and standard-setting projects
  - (ii) supporting the implementation of ISSB Standards IFRS S1 and IFRS S2
  - (iii) researching targeted enhancements to the ISSB Standards
  - (iv) enhancing the Sustainability Accounting Standards Board (SASB) Standards
- b) Please explain the reasons for your ranking order and specify the types of work the ISSB should prioritize within each activity.
- c) Should any other activities be included within the scope of the ISSB's work? If so, please describe these activities and explain why they are necessary.

### **Response:**

#### *Ranking of activities and rationale for ranking*

Supporting the implementation of IFRS S1 and IFRS S2 should be the highest priority for the ISSB in its next two-year work plan and should take precedence over other proposed activities.

Understanding and implementing the standards will be challenging and resource-intensive for most issuers, particularly small and medium size issuers (which make up a large portion of the Canadian reporting issuer population). For many issuers, this will be their first time providing comprehensive sustainability disclosures so they will need to develop the expertise and capacity to comply with the disclosure standards.

While some of the expected challenges have been identified, a deeper understanding of the more specific challenges and interpretation issues will inevitably emerge as issuers and their advisors work to implement the standards. We recommend that the ISSB establish an interpretations committee to consider and make decisions on these issues which will enable a common understanding and consistent application of the standards.

The ISSB needs to prioritize and allocate sufficient resources to provide the significant guidance and support that will be needed. Implementation support will be critical to ensuring that there is appropriate and consistent application of these first two standards – for example, across jurisdictions, industries, etc. This will



be critical to develop credibility of the standards, to encourage adoption by local regulators as well as voluntary market adoption, and to meet the intended purpose of providing a global baseline for sustainability disclosures for users of this information. Fully understanding and working through the “pain points” for these initial standards will also help lay the foundation for the development of future ISSB disclosure standards.

Detailed guidance and examples of appropriate disclosure are needed, particularly in the area of scenario analysis and with respect to conducting a materiality assessment in the context of sustainability reporting. There is also a need for clarity and guidance on how to assess “undue cost and efforts” as a rationale for reduced disclosures in the various instances where it is being offered as a relief mechanism in the standards. While we acknowledge that this concept is already used in the financial reporting context, there is not a common understanding of what it means in the context of sustainability reporting. Guidance is needed for the mechanism to be appropriately applied.

To continue the strong momentum that has been built by the ISSB, we are supportive of the ISSB conducting new research on additional sustainability topics, to the extent that it does not significantly impede its ability to allocate appropriate time and resources to IFRS S1 and IFRS S2 capacity building activities.

#### *Other activities*

We do not have any suggestions for additional activities for the ISSB to consider outside of what has been proposed. However, we strongly encourage the ISSB to continue its work with regulators across jurisdictions to address interoperability issues. We have consistently heard from preparers that providing sustainability disclosures under different regulatory and voluntary disclosure frameworks poses a significant burden, particularly for those operating in multiple jurisdictions.

In determining incremental areas of work in the near term, we strongly encourage the ISSB to consider what is realistically feasible for itself and the market. We have consistently heard concerns about the lack of issuer resources to implement the new sustainability disclosures, and concurrently contribute and respond to various sustainability-disclosure related consultations from a variety of sources, e.g., regulatory, standards, voluntary frameworks. There is a need to balance the desire for new research and standard setting against the need to allow sufficient time and resources to allow the existing standards to be absorbed by the market.

<b>Question 2 – Criteria for assessing sustainability reporting matters that could be added to the ISSB’s work plan</b>
Paragraphs 23 – 26 discuss the criteria the ISSB proposes to use when prioritizing sustainability-related reporting issues that could be added to its work plan.
a) Do you think the ISSB has identified the appropriate criteria?
b) Should the ISSB consider any other criteria? If so, what criteria and why?

**Response:**

We believe the criteria presented by the ISSB are generally complete. However, we recommend the ISSB consider the following:

- Will the criteria allow the ISSB to appropriately select sustainability-related topics for future research and standards development. In particular, is the criteria adequate enough to identify emerging issues such as externalities or potential market failures that may not be reflected in current reporting (e.g., how would the current framework consider the increased use and emerging concerns with AI?)
- Should some of the criteria be more heavily weighted than others? For example, should ‘investor needs’ have a relatively higher weighting given the focus of the ISSB on reporting for investors?
- How will “importance” be defined in this context? For example, time sensitivity of issues should likely contribute to this analysis. In the context of sustainability topics, there are some topics (e.g., climate change) wherein the ability to shape the outcome will be time sensitive. We suggest developing sub-criteria or considerations to inform the analysis of relative importance.
- While the criteria are based on that used by the IASB, there is a need for consideration of whether and how the criteria are applicable in the context of sustainability topics. For example, the criteria “whether there are any deficiencies in the way companies disclose information” is likely not as relevant or useful in this context given there is a common understanding that there are generally deficiencies in reporting for most sustainability topics at this juncture.
- Consideration of the costs versus benefits of the potential project.

**Question 3 – New research and standard-setting projects that could be added to the ISSB’s work plan**

Paragraphs 27–38 provide an overview of the ISSB’s approach to identifying sustainability-related research and standard setting projects. Appendix A describes each of the proposed projects that could be added to the ISSB’s work plan.

- a) Taking into account the ISSB’s limited capacity for new projects in its new two-year work plan, should the ISSB prioritise a single project in a concentrated effort to make significant progress on that, or should the ISSB work on more than one project and make more incremental progress on each of them?
  - (i) If a single project, which one should be prioritised? You may select from the four proposed projects in Appendix A or suggest another project.

- (ii) If more than one project, which projects should be prioritised and what is the relative level of priority from highest to lowest priority? You may select from the four proposed projects in Appendix A or suggest another project (or projects).

**Response:**

*Single versus multiple projects*

There are mixed views on whether the ISSB should pursue a single project or multiple projects (making incremental progress on each of the projects). It is difficult to respond to these questions without understanding the extent of the ISSB's resources and the nature and timing of particular research projects. However, we believe it is important for the ISSB to continue its research and standard setting on new sustainability topics.

*Which projects to prioritize*

All three sustainability topics proposed by the ISSB for future research – biodiversity, ecosystems and ecosystem services; human capital; and human rights – are relevant and important from a number of perspectives. Consequently, it is difficult to rank their relative priority as this will depend on variety of factors including industry, geography, company-specific considerations. Biodiversity, ecosystems and ecosystem services emerged as the most commonly supported topic for new research and standard setting projects by the ISSB.

Biodiversity

There has been growing international momentum, including the landmark agreement made at the UN Biodiversity Conference in December 2022 (COP 15) to guide global action on nature through to 2030. There is also strong connection between climate and biodiversity<sup>1</sup> which supports pursuing this as the next topic-specific area of research and standard setting by the ISSB, following the issuance of IFRS S2.

In conducting research and developing any new topic-specific standards, we strongly encourage the ISSB to continue to take the approach of leveraging existing reputable and established research and disclosure frameworks (such as the framework of the Task Force on Nature-related Financial Disclosures (TNFD)). CPA Canada has also recently published [Valuing Natural Capital – Is it on Your Radar?](#), which may be a useful resource for any research by the ISSB on this topic.

As part of any future work on biodiversity, we believe that more work and outreach needs to be done with Indigenous peoples. Indigenous peoples are and have long been the primary stewards of biodiversity worldwide, currently protecting 80% of the world's remaining biodiversity.

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<sup>1</sup> For more information see [Biodiversity - our strongest natural defense against climate change | United Nations](#)





### Human capital and human rights

We encourage the ISSB to consider the following when planning for future work on human capital and human rights:

- There are inherent linkages and intersections between some human capital and human rights issues, so research and standard setting should not be siloed. The ISSB may want to consider covering these topics in a single project, rather than separately.
- Given the natural intersection and overlap between the topics, there is a need for clarification on any perceived distinction between the topics by the ISSB for its future research and standard setting work.
- The topics may be universally relevant to companies, irrespective of location and industry.
- There may be fewer resources required by the ISSB for these topics as there are existing and emerging laws and disclosure requirements in a number of jurisdictions.
- There is a need for more clarity on the scope of subtopics that may be included under human rights.

### Other factors to consider

Additional factors that we suggest the ISSB consider when determining what projects to focus on include:

- Balancing the capacity to work on multiple projects against allocating an inordinate amount of resources to one project. Resource needs will differ as sustainability topics are at various stages of maturity. For topics where there has been less research or initiatives to date, the ISSB will need to invest more time and resources.
- Considering interoperability and synergies that can be leveraged from other regulatory and standard setting initiatives could also be a basis for topics of priority.
- Conducting the research and standard setting with the understanding that there is overlap and interconnections between various sustainability topics, so they should not be addressed in silos.

### Need for tailored standards

There is generally a need for tailored standards for sustainability standards because the issues do vary significantly by issuer, industry, and geography. We heard that having an industry-based approach could help alleviate resource burden as issuers can focus on what is important for their company and stakeholders, rather than having to consider irrelevant disclosures.

We view the use of the SASB standards as a key means to fulfilling this objective. However, the ISSB should consider how including specific industry standards would affect timelines and resources (i.e., more time needed for consultation on SASB industry-specific standards).

**Question 4 – New research and standard-setting projects that could be added to the ISSB’s work plan: Biodiversity, ecosystems and ecosystem services**

The research project on **biodiversity, ecosystems and ecosystem services** is described in paragraphs A3–A14 of Appendix A. Please respond to these questions:

- a) Of the subtopics identified in paragraph A11, to which would you give the highest priority? Please select as many as applicable. Please explain your choices and the relative level of priority with particular reference to the information needs of investors.

You may also suggest subtopics that have not been specified. To help the ISSB analyse the feedback, where possible, please provide:

- (i) a short description of the subtopic (and the associated sustainability-related risks and opportunities); and
- (ii) your view on the importance of the subtopic with regard to an entity’s sustainability-related risks and opportunities and the usefulness of the related information to investors.

- b) Do you believe that sustainability-related risks and opportunities related to this topic are substantially different across different business models, economic activities and other common features that characterise participation in an industry, or geographic locations such that measures to capture performance on such sustainability-related risks and opportunities would need to be tailored to be specific to the industry, sector or geographic location to which they relate?

Please explain your reasoning and provide examples of how sustainability-related risks and opportunities related to this topic will either be (i) substantially different or (ii) substantially the same across different industries, sectors or geographic locations.

- c) In executing this project, the ISSB could leverage and build upon the materials of the ISSB and other standard setters and framework providers to expedite the project, while taking into consideration the ISSB’s focus on meeting the needs of investors. Which of the materials or organisations referenced in paragraph A13 should be utilised and prioritised by the ISSB in pursuing the project? Please select as many as applicable.

Please explain your choices and the relative level of priority with particular reference to the information needs of investors. You can suggest materials that are not specified. You can suggest as many materials as you deem necessary. To help the ISSB analyse the feedback, where possible, please explain why you think the materials are important to consider.

**Response:**

*Subtopics to prioritize*

All the subtopics presented by the ISSB are significant and interrelated, but we heard that special attention should be paid to the rising importance of land-use and land-use change. Addressing water and pollution should be the next areas of priority for this topic.

**Question 5 – New research and standard-setting projects that could be added to the ISSB’s work plan: Human capital**

The research project on **human capital** is described in paragraphs A15–A26 of Appendix A. Please respond to the following questions:

- a) Of the subtopics identified in paragraph A22, to which would you give the highest priority? Please select as many as applicable.

Please explain your choices and the relative level of priority with particular reference to the information needs of investors.

You may also suggest subtopics that have not been specified. To help the ISSB analyse the feedback, where possible, please provide:

- (i) a short description of the subtopic (and the associated sustainability-related risks and opportunities); and
- (ii) your view on the importance of the subtopic with regard to an entity’s sustainability-related risks and opportunities and the usefulness of the related information to investors.

- b) Do you believe that sustainability-related risks and opportunities related to this topic are substantially different across different business models, economic activities and other common features that characterise participation in an industry, or geographic locations such that measures to capture performance on such sustainability-related risks and opportunities would need to be tailored to be specific to the industry, sector or geographic location to which they relate?

Please explain your reasoning and provide examples of how sustainability-related risks and opportunities related to this topic will either be (i) substantially different or (ii) substantially the same across different industries, sectors or geographic locations.

- c) In executing this project, the ISSB could leverage and build upon the materials of the ISSB and other standard setters and framework providers to expedite the project, while taking into consideration the ISSB’s focus on meeting the needs of investors. Which of the materials or

organisations referenced in paragraph A25 should be prioritised by the ISSB in pursuing its research? Please select as many as applicable.

Please explain your choices and the relative level of priority with particular reference to the information needs of investors. You can suggest materials that are not specified. You can suggest as many materials as you deem necessary. To help the ISSB analyse the feedback, where possible, please explain why you think the materials are important to consider.

**Response:**

*Subtopics to prioritize*

Diversity, equity and inclusion (DEI) is viewed as the highest priority subtopic under human capital, followed by worker well-being. We also note that this is high on the regulatory agenda. For example, the Canadian Securities Administrators is currently seeking public comment on proposed amendments to corporate governance disclosure rules and policies relating to the diversity on boards and executive officer positions. Additionally, proposals for enhanced disclosures are expected to be issued by the United States Securities and Exchange Commission in the next 12 months for human capital management (October 2023) and corporate board diversity (April 2024) according to its [Spring 2023 regulatory agenda](#).

We also heard that the scope of subtopics to be addressed for human capital should be narrowed down to ensure it is manageable and facilitates timely progress within the ISSB workplan.

CPA Canada has recently published the following resources that may be useful for any research by the ISSB on this topic.

- [The Rise of the Social Pillar: An Introduction to the 'S' in ESG](#)
- [State of Play: Study of Social Disclosure by Canadian Public Companies](#)

**Question 6 – New research and standard-setting projects that could be added to the ISSB’s work plan: Human rights**

The research project on **human rights** is described in paragraphs A27–A37 of Appendix A. Please respond to these questions:

- a) Within the topic of human rights, are there particular subtopics or issues that you feel should be prioritised in the ISSB’s research?

You can suggest as many subtopics or issues as you deem necessary. To help the ISSB analyse the feedback, where possible, please provide:

- (i) a short description of the subtopic (and the associated sustainability-related risks and opportunities); and
- (ii) your view on the importance of the subtopic with regard to an entity's sustainability-related risks and opportunities and the usefulness of the related information to investors.

- b) Do you believe that sustainability-related risks and opportunities related to this topic are substantially different across different business models, economic activities and other common features that characterise participation in an industry, or geographic locations such that measures to capture performance on such sustainability-related risks and opportunities would need to be tailored to be specific to the industry, sector or geographic location to which they relate?

Please explain your reasoning and provide examples of how sustainability-related risks and opportunities related to this topic will either be (i) substantially different or (ii) substantially the same across different industries, sectors or geographic locations.

- c) In executing this project, the ISSB could leverage and build upon the materials of the ISSB and other standard setters and framework providers to expedite the project, while taking into consideration the ISSB's focus on meeting the needs of investors. Which of the materials or organisations referenced in paragraph A36 should be prioritised by the ISSB in pursuing its research? Please select as many as applicable.

Please explain your choices and the relative level of priority with particular reference to the information needs of investors. You can suggest materials that are not specified. You can suggest as many materials as you deem necessary. To help the ISSB analyse the feedback, where possible, please explain why you think the materials are important to consider.

**Response:**

*Subtopics to prioritize*

Forced labour and child labour are viewed as areas of high priority to address under the topic of human rights. We note that modern slavery legislation has been introduced in a number of jurisdictions including in Canada and there are many additional reporting requirements for companies which could be leveraged by the ISSB. For more information, please see CPA's Canada's recent resource [Fighting Against Forced Labour and Child Labour in Supply Chains Act – Is it on Your Radar?](#)

It is also important for Indigenous-specific topics to be addressed as a distinct subtopic as part of human rights and human capital. For example, we have heard that it is generally not appropriate to group the topic of engagement with Indigenous peoples with other community engagement activities and it is important to disaggregate diversity data with respect to Indigenous peoples. The United Nations Declaration on the Rights of Indigenous Peoples should also be considered as part of future research and standard setting.

**Question 7 – New research and standard-setting projects that could be added to the ISSB’s work plan: Integration in reporting**

The research project on integration in reporting is described in paragraphs A38–A51 of Appendix A. Please respond to the following questions:

- a) The integration in reporting project could be intensive on the ISSB’s resources. While this means it could hinder the pace at which the topical development standards are developed, it could also help realise the full value of the IFRS Foundation’s suite of materials. How would you prioritise advancing the integration in reporting project in relation to the three sustainability-related topics (proposed projects on biodiversity, ecosystems and ecosystem services; human capital; and human rights) as part of the ISSB’s new two-year work plan?
- b) In light of the coordination efforts required, if you think the integration in reporting project should be considered a priority, do you think that it should be advanced as a formal joint project with the IASB, or pursued as an ISSB project (which could still draw on input from the IASB as needed without being a formal joint project)?
  - (i) If you prefer a formal joint project, please explain how you think this should be conducted and why.
  - (ii) If you prefer an ISSB project, please explain how you think this should be conducted and why.
- c) In pursuing the project on integration in reporting, do you think the ISSB should build on and incorporate concepts from:
  - (i) the IASB’s Exposure Draft Management Commentary? If you agree, please describe any particular concepts that you think the ISSB should incorporate in its work. If you disagree, please explain why.
  - (ii) the Integrated Reporting Framework? If you agree, please describe any particular concepts that you think the ISSB should incorporate in its work. If you disagree, please explain why.
  - (iii) other sources? If you agree, please describe the source(s) and any particular concepts that you think the ISSB should incorporate in its work.
- d) Do you have any other suggestions for the ISSB if it pursues the project?



**Response:**

*Prioritization of project*

Ensuring connectivity between the ISSB and IASB's respective requirements is important and should be a priority, but fully integrated reporting may be too ambitious in the short term. We believe that integration in reporting should be a longer-term objective for the ISSB. There is a need for education and clarity on what integration in reporting means as this is a new concept for many.

*Project leadership*

We generally heard support for any future project on integration in reporting being pursued as a joint project between the ISSB and the IASB in order to leverage the respective expertise and resources, and to ensure that there is a thoughtful, efficient and cohesive approach to the project. This approach will enable the development of a more comprehensive and robust reporting framework.

*Materials to leverage*

We are supportive of the project on integration in reporting building on and leveraging concepts from both the Management Commentary and the Integrated Reporting Framework as they would both have relevant information for this project. We also note that in Canada we have a comprehensive suite of disclosure requirements for public companies under the Management's Discussion and Analysis and Annual Information Form that address many of the topics that are included in the Management Commentary. It will be important to communicate how this project will benefit jurisdictions with regulatory reporting requirements that cover similar areas.