

# PRI CONSULTATION RESPONSE

**Proposed Amendments to the SASB Standards**

**November 2025**

An investor initiative in partnership with  
UNEP Finance Initiative and UN Global Compact



# About this consultation

The IFRS Foundation's International Sustainability Standards Board (ISSB) is [consulting](#) on amendments to the SASB Standards to enhance their alignment with other global standards and frameworks, strengthen their international applicability and ultimately improve the decision-usefulness of sustainability disclosures for investors.

The SASB Standards are a set of industry-specific disclosure guidance on sustainability-related risks and opportunities, covering 77 industries. The ISSB Standards require companies to consider the SASB Standards when identifying sustainability risks and opportunities and disclosures about these.

The proposed amendments:

1. Present a comprehensive review of nine industries (all eight industries in the Extractives & Minerals Processing sector and the Processed Foods industry).
2. Align some metrics in a further 41 industries for topics such as Water Management and Workforce Health & Safety.
3. Propose updates to Industry-based Guidance on Implementing IFRS S2 (affecting the nine prioritised industries and 37 of the 41 industries) to maintain alignment with climate-related content in the SASB Standards.

The ISSB has committed to publish exposure drafts of proposed enhancements for three further SASB Standards before the end of 2025: Electric Utilities & Power Generators and two SASB Standards in the Food & Beverage sector. Later this year, the ISSB will consider a further set of industries to prioritise for enhancements.

The PRI is the leading organisation in advancing responsible investment globally. Set up with United Nations' support, our unique community contributes to stable financial markets and a more prosperous world for all. We bring together signatories, amplify their voices and provide resources and guidance for complex sustainability challenges. The six Principles were developed by investors, for investors. In implementing them, signatories contribute to developing a more sustainable global financial system.

The PRI develops policy analysis and recommendations based on signatory views and evidence-based policy research. The PRI welcomes the opportunity to respond to the ISSB's call for feedback on amendments to the SASB Standards.

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While the policy recommendations herein have been developed to be globally applicable, the PRI recognises that the way in which policy reforms are implemented may vary by jurisdiction and according to local circumstances. Similarly, the PRI recognises that there may be circumstances where there are merits to allowing market-led initiatives to precede regulatory requirements.

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# PRI response

**The PRI welcomes the proposed amendments to the SASB Standards and Industry-based Guidance on Implementing IFRS S2, which can significantly improve sustainability disclosure by investees.**

Signatories have indicated that decision-useful sustainability disclosure should include a combination of sector-agnostic requirements – to improve the availability and comparability of data across investors’ global and multi-sector portfolios – and sector-specific requirements and guidelines, given certain metrics are only relevant to one or more sectors.

The SASB Standards play an important role in resolving ongoing challenges related to availability, consistency, quality and relevance of sector-specific data – particularly for sustainability issues for which there is no issue-specific ISSB Standard. Sector standards also support investors’ identification of material risks and opportunities, and sector-specific investee disclosures play an important role in investors’ analysis and decision-making; they provide relevant information that aligns with how many investors evaluate and structure their portfolios (i.e. by industry or sector).

For reporting entities, in turn, SASB Standards function as sector-specific ISSB implementation guidance, supporting the identification of material sustainability risks and opportunities and their disclosures [IFRS S1, paragraphs 54-58].

We welcome efforts to improve interoperability of SASB Standards with international initiatives such as the Global Reporting Initiative (GRI) standards, European Sustainability Reporting Standards (ESRS) and the Framework of the Taskforce on Nature-related Financial Disclosures (TNFD). This will enhance the comparability and decision-usefulness of sustainability disclosure by portfolio companies, many of which disclose on more than one framework (particularly for issues outside of climate).

We recognise that the SASB updates under consultation also link with the ISSB’s ongoing work on nature and human capital, as they give stakeholders the opportunity to comment on SASB metrics related to specific issues. These include indicators associated with Greenhouse Gas Emissions, Energy Management, Water Management, Labour Practices and Workforce Health & Safety. However, for completeness, it will be important to build on these SASB updates with both sector-agnostic standards and additional sector-specific requirements in the future.

*The PRI has experience of contributing to public policy on sustainable finance and responsible investment across multiple markets. It will continue to support the production, global adoption and implementation of ISSB standards, to improve sustainability disclosure investors receive from investees across their global portfolios.*

*Please send any questions or comments to [benjamin.taylor@unpri.org](mailto:benjamin.taylor@unpri.org).*

*More information on [www.unpri.org](http://www.unpri.org)*