



Introduction

The International Sustainability Standards Board (ISSB) issued its first two sustainability reporting standards on 26 June 2023:

- General Requirements for Disclosure of Sustainability-related Financial Information (IFRS S1), which is the core framework for the disclosure of material information about sustainability-related risks and opportunities across an entity's value chain.
- Climate-related Disclosures (IFRS S2), which is the first thematic standard, and sets out requirements for entities to disclose information about climate-related risks and opportunities.

The IFRS Foundation established the ISSB to address the fragmented landscape of voluntary, sustainability-related standards and requirements that add cost, complexity and risk to both companies and investors. The ISSBTM mandate is to develop and issue a comprehensive global baseline of sustainability reporting standards (IFRS® Sustainability Disclosure Standards) for consistent, comparable and high-quality sustainability reporting designed to meet investor needs.

IFRS S1 requires an entity to disclose information about all sustainability-related risks and opportunities. However, given the global focus on climate, the ISSB produced its first thematic standard, IFRS S2, to provide specific requirements for climate-related disclosures.

The IFRS Sustainability Disclosure Standards are based on the four-pillars of the Task Force on Climate-Related Financial Disclosures (TCFD framework): governance, strategy, risk management and metrics and targets. [IFRS S1 para BC3]. The TCFD framework is required or used voluntarily in a number of territories. Therefore the structure of the IFRS Sustainability Disclosure Standards will be familiar to preparers and users of sustainability reporting that have used, or have an understanding of, the TCFD framework.

Consistent with the process to adopt International Financial Reporting Standards (IFRS), IFRS Sustainability Disclosure Standards need to be adopted by local securities exchanges and other regulators to become mandatory; several organisations have already announced their intention to do so and it is likely that many more will follow. An entity can choose to voluntarily apply IFRS Sustainability Disclosure Standards, even if the entity does not apply IFRS.

This In depth should be read in conjunction with the IFRS Sustainability Disclosure Standards and is not intended to be a comprehensive guide to the disclosure requirements in IFRS S1 and IFRS S2. Refer to PwC's [In brief](#) for a short summary of IFRS S1 and IFRS S2.

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1. General requirements for disclosure of sustainability-related financial information (IFRS S1)

1.1 Overview

IFRS S1 requires an entity to disclose information about its sustainability-related risks and opportunities that is useful to the primary users of general purpose financial reporting (referred to as the 'primary users') in making decisions relating to providing resources to the entity. [IFRS S1 para 1]. The primary users are existing and potential investors, lenders and other creditors of the entity. [IFRS S1 App A].

To effectively identify sustainability-related risks and opportunities, and to meet the objective of IFRS S1, an entity needs to have an understanding of the resources that it relies on, and relationships along its value chain. Paragraph 2 of IFRS S1 explains that an entity and the resources and relationships throughout its value chain form an interdependent system in which the entity operates. That is, an entity's relationships and interactions with stakeholders, society, the economy and the natural environment throughout its value chain are inextricably linked to the ability of the entity to generate, amongst other things, cash flows over the short, medium and long term.

An entity's dependencies and impacts on resources and relationships give rise to sustainability-related risks and opportunities. These risks and opportunities might influence an entity's cash flows, access to finance or cost of capital over the short, medium or long term. [IFRS S1 para 3]. These are collectively referred to as 'sustainability-related risks and opportunities that could reasonably be expected to affect the entity's prospects'. [IFRS S1 para 3]. The analysis performed to identify sustainability-related risks and opportunities is the first step a reporting entity would take in determining which information to include in its sustainability reporting.

The application guidance explains that resources and relationships are a source of value for an entity. The ability of an entity to create, preserve or erode value for itself is inextricably linked to the value that it creates, preserves or erodes for others. [IFRS S1 App B para B3]. Therefore, an understanding of an entity's resources and relationships, and the value that an entity derives, facilitates the identification of sustainability-related risks and opportunities.



PwC observation: Identifying value

The application guidance explains that the resources that an entity depends on and impacts can vary and take different forms. These resources include, but are not limited to, financial, manufactured, intellectual, human, relationship, and natural. [IFRS S1 App B para B4]. These are similar to the capitals within the Integrated Reporting Framework (IRF). Paragraph BC41 of IFRS S1 clarifies that, even though the objective of IFRS S1 builds on the IRF, IFRS S1 does not use identical terms.

Understanding the concept of 'value', as explained in the IRF, helps to focus on the areas of a business which lead to value preservation, regeneration, development or deterioration and depletion. For example, an increase in training would develop the value of the human aspect of the business but would deplete the financial side, although not necessarily by the same amount.

Value created, eroded or preserved for others

Paragraph B3 of IFRS S1 references the close relationship between an entity's ability to create value for itself and the value it creates, preserves or erodes for other parties. This could be misinterpreted by preparers as a reference to impact materiality¹. To clarify the close relationship between the value that the entity creates, preserves or erodes for others and the entity's own ability to succeed and achieve its goals, refer to the following example.

The pesticides used to protect an entity's crops from disease today might affect the surrounding bee populations responsible for the pollination of the crops. The entity's ability to generate future cash flows from the sale of the crops is inextricably linked to the health of the bee population. If the pesticides used inadvertently kill the bee population, the crops won't be pollinated and, as a result, the entity's use of pesticides today might impact the entity's ability to sell the crops in the future. Consequently, the health of the bee population impacts the entity's ability to generate value for itself.

1.2 Identification and disclosure of sustainability-related risks and opportunities

Understanding the link between the entity's prospects (as defined above) and sustainability-related risks and opportunities it is exposed to is critical. IFRS S1 explains a process consisting of two steps to identify and disclose all material sustainability-related risks and opportunities that could reasonably be expected to affect the entity's prospects:

- Step 1: identify sustainability-related risks and opportunities that could affect an entity's prospects over the short, medium and long term.
- Step 2: determine which disclosures to provide in relation to the sustainability-related risks and opportunities identified in step 1.

In making this assessment an entity must consider not only its own activities, but also those in its value chain.

1.2.1 Step 1: identify sustainability-related risks and opportunities

When an entity is identifying sustainability-related risks and opportunities that affect the entity's prospects, it is required to initially consider the IFRS Sustainability Disclosure Standards – that is, IFRS S1 and any thematic standards issued by the ISSB. [IFRS S1 para 54]. In addition to the IFRS Sustainability Disclosure Standards, an entity is required to refer to and consider the applicability of the disclosure topics in the Sustainable Accounting Standards Board (SASB) standards. [IFRS S1 para 55(a)]. The SASB standards are industry-based (for example, oil & gas – exploration & production and commercial banking) and specify disclosure topics appropriate for that industry (for example, water management) and a list of metrics within each disclosure topic (for example, total water withdrawn, total water consumed and the percentage of each in regions with high or extremely high baseline water stress).

However, as discussed in section '1.1 Overview', IFRS S1 requires an entity to consider its ability to create value for itself and the value it creates, preserves or erodes for others, which is not a concept familiar to the SASB standards. As a result, the SASB standards in isolation do not address all sustainability-related disclosure topics that might be relevant to a reporting entity.

¹ See PwC's In depth, ['Worldwide impact of CSRD – are you ready?'](#) for more detail regarding impact materiality.

PwC observation: SASB standards

Based on paragraph 55(a) of IFRS S1, an entity 'shall refer to and consider' the disclosure topics in the SASB standards when identifying sustainability-related risks and opportunities. Typically, 'shall' refers to a requirement – that is, there is no optionality available to the entity. Paragraph BC131 of IFRS S1 clarifies that an entity is required to consider the SASB standards in a systematic manner, but not required to apply each of the individual provisions if such disclosures are not relevant to the decision-making of users of general purpose financial reports and do not faithfully represent sustainability-related risk or opportunity. Paragraph 55(a) of IFRS S1 explicitly states that an entity might conclude that the disclosure topics included in the SASB standards are not applicable to its circumstances.

Since an entity cannot simply disregard the SASB standards, it should clearly document for internal purposes how it has assessed and taken into consideration the applicability of the SASB standards when identifying sustainability-related risks and opportunities.

IFRS S1 indicates that an entity may also consider the following sources of guidance to identify other sustainability-related risks and opportunities that could affect the entity's prospects over the short, medium and long term:

- The Climate Disclosure Standards Board (CDSB) framework application guidance for water- and biodiversity-related disclosures.
- The most recent pronouncements of other standard-setting bodies whose requirements are designed to meet the needs of primary users.
- The sustainability-related risks and opportunities identified by entities that operate in the same industries or geographies.

[IFRS S1 para 55(b)].

In identifying sustainability-related risks and opportunities that could affect the entity's prospects over the short, medium or long term, an entity is required to apply judgement. As part of applying this judgement, the entity is required to use all reasonable and supportable information that is available to the entity at the reporting date without undue cost or effort. [IFRS S1 App B para B6(a)].

1.2.1.1 Reasonable and supportable information

An entity is not required to perform an exhaustive search to identify those sustainability-related risks and opportunities that could affect the entity's prospects over the short, medium or long term. [IFRS S1 App B para B10]. The determination of what constitutes reasonable and supportable information includes entity-specific facts as well as general conditions in the external environment. [IFRS S1 App B para B8]. This would include internal and external sources, such as: the entity's risk management processes; industry and peer group experience; and external ratings, reports and statistics. The associated effort to the entity should be compared to the benefits of the resulting information to the primary users. The more useful the sustainability-related information for users, the more effort is expected of an entity in obtaining that information. [IFRS S1 para BC17].

1.2.1.2 Assessing materiality

Once all the sustainability-related risks and opportunities that could reasonably be expected to affect an entity's prospects have been identified, the entity then needs to consider which of the sustainability-related risks and opportunities are material. Paragraph B25 of IFRS S1 is clear that only material information needs to be disclosed. That is, as with all IFRS reporting standards, an entity does not need to disclose any immaterial information even if required by an IFRS Sustainability Disclosure Standard. Consistent with the definition of materiality in IFRS reporting, information is material if omitting, misstating or obscuring that information could reasonably be expected to influence decisions that the primary users make on the basis of that information. [IFRS S1 para 18].

1.2.2 Step 2: determine which disclosures to provide in relation to the sustainability-related risks and opportunities identified in step 1

When determining what information could be material to disclose, an entity is required to refer to the relevant IFRS Sustainability Disclosure Standard that addresses that specific risk or opportunity. [IFRS S1 para 56].

When an IFRS Sustainability Disclosure Standard does not specifically address a sustainability-related risk or opportunity, the entity is required to apply judgement in identifying information that faithfully represents the specific risk or opportunity and would be relevant to the decision-making needs of the entity's primary users. [IFRS S1 para 57]. In making this judgement, the entity:

- shall refer to and consider the applicability of the metrics included within the disclosure topics in the industry-based SASB standards; and
- may also consider, to the extent they do not conflict with an IFRS Sustainability Disclosure Standard:
 - the CDSB framework application guidance for water- and biodiversity-related disclosures;
 - the most recent pronouncements of other standard-setting bodies whose requirements are designed to meet the information needs of primary users;
 - the information, including metrics, disclosed by entities in the same industry (or industries) or geographical region(s); and
 - the European Sustainability Reporting Standards (ESRS) and the Global Reporting Initiative (GRI) standards, to the extent that these assist the entity in meeting the objective of IFRS S1.

[IFRS S1 para 58].

PwC observation: Sources of guidance

Referring to specific frameworks is intended to lead to interoperability of the different sustainability reporting frameworks and will, it is hoped, promote convergence.

The ISSB has also issued accompanying guidance for IFRS S1 that includes illustrative guidance, which is not intended to provide interpretative guidance. The illustrative guidance explains how the SASB standards and CDSB framework can be applied to meet the requirements in IFRS S1. Although the illustrative guidance acknowledges that the SASB standards or CDSB framework might not cover all sources of guidance, no additional explanation on the application of other guidance is given.

In addition, the accompanying guidance includes two illustrative examples. The illustrative examples focus specifically on how an entity might apply the SASB standards. For example, IFRS S1 Example 1, which focuses on the airline industry, does not include disclosure about the diversity of the entity's workforce or the equality of compensation among genders, because these are not addressed by the SASB standard. However, if this information is material for this industry, preparers would consider additional sources of guidance, beyond the SASB standards, to ensure that all material sustainability-related risks and opportunities are identified and disclosed.

Reference to ESRS and GRI

The consideration of the ESRS and GRI standards is limited to the determination of the applicable disclosures. IFRS S1 does not refer an entity to either ESRS or GRI standards as part of step 1 to identifying material sustainability-related risks and opportunities. This is because the objective of ESRS and GRI standards is focused on providing information to a much broader set of stakeholders in addition to the primary users.

Note: the IFRS Sustainability Disclosure Standards only require material information to be disclosed. [IFRS S1 App B para B25]. For the remainder of this In depth, when referring to sustainability-related risks and opportunities it is assumed they have been determined to be material.

1.3 Other important concepts in IFRS S1

1.3.1 Fair presentation

IFRS S1 requires the fair presentation of sustainability-related financial disclosures. In order to achieve fair presentation, an entity is required to provide a complete, neutral and accurate depiction of the entity's sustainability-related risks and opportunities. [IFRS S1 para 13]. An entity is required to disclose additional information if the disclosures required by IFRS Sustainability Disclosure Standards are insufficient to enable primary users to assess the effects of sustainability-related risks and opportunities on the entity's prospects. [IFRS S1 para 15(b)].

1.3.2 Reporting entity

An entity is required to provide sustainability-related financial disclosures applying the same reporting boundary as used for financial reporting purposes. For example, assume that an entity is the parent of a group of companies and is required to prepare consolidated financial statements in accordance with IFRS, which is the group's applicable accounting framework. The consolidated financial statements are for the parent and its subsidiaries. The entity is required to provide its sustainability-related financial disclosures in its sustainability reporting on the same basis. [IFRS S1 App B para B38].

An entity is separately required to provide sustainability-related information regarding sustainability-related risks and opportunities in the entity's value chain². This requirement does not alter the reporting boundary, but it highlights that an entity's prospects are affected by sustainability-related risks and opportunities arising from the entity's value chain. An entity's value chain is defined as the full range of activities, resources and relationships related to the entity's business model and the external environment in which the entity operates. This includes the activities, resources and relationships that the entity uses and relies on to create its products or services from conception to end-of-life. [IFRS S1 App A]. That is, entities in the upstream and downstream activities related to the entity's business model are included in the value chain.

PwC observation: Value chain

An entity's sustainability reporting processes and controls might not be as well established as its financial reporting processes and controls. As a result, the entity is likely to encounter challenges in determining the scope of its value chain and obtaining the necessary information from entities within its value chain.

However, IFRS S1 provides some relief for an entity when identifying the scope of, and information from, its value chain. Paragraph B6(b) of IFRS S1 states that an entity is required to use all reasonable and supportable information that is available to the entity at the reporting date without undue cost or effort to determine the scope of the value chain. Refer to '1.2.1.1 Reasonable and supportable information' for more detail on interpreting reasonable and supportable information.

Upstream and downstream activities

Although not explicitly defined in IFRS Sustainability Disclosure Standards, upstream activities generally include activities by a party other than the entity that relate to the initial stages of the entity's production of a good or service (for example, materials sourcing, materials processing and supplier activities). Downstream activities include activities by a party other than the entity that relate to any process after the entity's input (for example, transportation and distribution, processing of sold products, the use of sold products, and end-of-life treatment of sold products).

1.3.3 Connected information

Paragraph 21 of IFRS S1 requires the entity to provide information to help primary users to understand the connections between sustainability-related risks and opportunities that could affect the entity's prospects. This includes connections between different sustainability-related risks and opportunities, and connections between sustainability-related financial information and disclosures in the entity's financial statements.

An entity is required to use the same financial data and assumptions for sustainability reporting purposes as is used for financial reporting purposes to the extent that this is possible and considering the applicable financial reporting principles. [IFRS S1 para 23]. However, there might be scenarios where assumptions used for financial and sustainability reporting do not align.

² Paragraph B5 of IFRS S1 includes investments in associates and joint ventures within an entity's value chain. However, these are just examples and the entity might, or might not, have an ownership interest in entities in its value chain.

PwC observation: Connected information

To illustrate the alignment of data and assumptions used in sustainability and financial reporting, consider the following examples:

Example 1 – The same financial data and assumptions

A manufacturer uses the number of units of a product that it is expected to produce when preparing its scenario analysis for its sustainability report. When carrying out its impairment assessment for financial reporting purposes, the entity should use the same projected number of units of the product that it is expected to produce.

Example 2 – Different financial data and assumptions

Certain financial reporting frameworks have specific requirements that have to be satisfied before improvements or enhancements to assets (and their expected increase in production) can be included in an impairment assessment. In contrast, an entity's scenario analysis for sustainability reporting might incorporate expected improvements in an asset's efficiency which might increase the number of units expected to be produced. As a result, the assumptions used for financial and sustainability reporting could be different.

1.3.4 Core content

The IFRS Sustainability Disclosure Standards are based on the four pillars used in the TCFD framework: governance, strategy, risk management, and metrics and targets. [IFRS S1 para BC3]. These pillars are referred to as the 'core content' in paragraph 25 of IFRS S1. This paragraph requires an entity to disclose material information in relation to each of the four pillars.

1.3.4.1 Governance

The governance-related disclosure requirements help primary users understand the entity's governance processes, controls and procedures that the entity uses to monitor and manage sustainability-related risks and opportunities. [IFRS S1 para 26]. To achieve this objective, an entity is required to disclose information including, but not limited to:

- the governance body or individual responsible for the oversight of sustainability-related risks and opportunities; and
- their role in those processes.

1.3.4.2 Strategy

An entity is required to disclose information about its strategy and how it addresses the identified sustainability-related risks and opportunities.

This includes disclosures regarding:

- the sustainability-related risks and opportunities that could affect the entity's prospects and the time horizons—short, medium or long term—over which the effects of each could reasonably be expected to occur;
- qualitative and quantitative information about the current and anticipated financial effects of sustainability-related risks and opportunities on the entity's business model and value chain (see '1.3.5 Current and anticipated effects');
- the effects of sustainability-related risks and opportunities on the entity's strategy and decision-making; and
- the effects of those sustainability-related risks and opportunities on the entity's financial position, financial performance and cash flows for the reporting period, and their anticipated effects over the short, medium and long term, taking into consideration how those sustainability-related risks and opportunities have been factored into the entity's financial planning.

[IFRS S1 para 29].

An entity is also required to disclose information that enables primary users to understand the resilience of the entity's strategy and business model to the identified sustainability-related risks. [IFRS S1 para 41].

PwC observation: Current and anticipated financial effects of sustainability-related risks and opportunities

Entities are required to disclose both the current and anticipated financial effects of sustainability-related risk and opportunities. [IFRS S1 para 34]. An entity is also required to separately disclose its resilience assessment. [IFRS S1 para 41].

Since these are two separate requirements in IFRS S1, while an entity might find its resilience assessment helpful in determining the anticipated financial effects of sustainability-related risks and opportunities, there is no requirement in IFRS S1 for an entity to use its resilience assessment to determine the anticipated financial effects of sustainability-related risks and opportunities. [IFRS S1 para BC113].

1.3.4.3 Risk management

The required risk management disclosures in IFRS S1 include the processes that the entity uses to identify, assess, prioritise and monitor identified sustainability-related risks and opportunities. Disclosure is also required about the extent to which, and how, these processes integrate into the entity's overall risk management processes. [IFRS S1 para 43].

Specifically in relation to the the processes the entity uses to identify, assess, prioritise and monitor sustainability-related risks, this includes disclosures regarding:

- the inputs and parameters used, such as information about data sources and the scope of operations covered in the processes;
- whether and how the entity uses scenario analysis to help identify sustainability-related risks;
- how the nature, likelihood and magnitude of the sustainability-related risks are assessed;
- whether and how sustainability-related risks are prioritised in relation to other types of risks;
- how the entity monitors sustainability-related risks; and
- Whether and how this process has changed from the prior year.

[IFRS S1 para 44(a)].

1.3.4.4 Metrics and targets

Once sustainability-related risks and opportunities have been identified and assessed as material, IFRS S1 requires an entity to disclose information to enable the primary users to understand the entity's performance in relation to these sustainability-related risks and opportunities, including industry-based metrics and progress towards any targets that the entity has set, or is required to meet by regulation or legislation. For each such target, an entity is required to disclose any milestones or interim targets, performance against the target, and an analysis of trends or changes in the entity's performance. [IFRS S1 para 51].

1.3.5 Current and anticipated effects

An entity is required to disclose information that enables primary users to understand the current and anticipated effects of sustainability-related risks and opportunities on its business model and value chain. [IFRS S1 para 32]. This includes a requirement for an entity to describe where these sustainability-related risks and opportunities are concentrated in the entity's value chain.

To determine the anticipated financial effects of sustainability-related risks and opportunities, an entity is required to use all reasonable and supportable information that is available to it at the reporting date without undue cost or effort. [IFRS S1 para 37(a)]. Quantitative information need not be provided about current and anticipated effects if it is not separately identifiable or is based on a measurement uncertainty that is so high the qualitative information would not be useful. [IFRS S1 para 38]. In addition, quantitative information need not be provided about anticipated effects if the entity does not have the skills, capabilities or resources to provide that quantitative information. [IFRS S1 para 39]. In both cases, additional qualitative disclosure is required, including the reason why quantitative information has not been provided.

Refer to '1.2.1.1 for more detail on interpreting reasonable and supportable information.

1.3.6 Location of disclosures

Sustainability-related disclosures must be provided as part of the entity's general purpose financial report. [IFRS S1 para 60].

Sustainability-related financial disclosures are likely to cover many different topics, such as climate, human capital and/or biodiversity. This information might not naturally fit into one particular place in the entity's general purpose financial report. IFRS S1 allows disclosure of sustainability-related financial information in various locations, subject to local regulation or laws which might be applicable to the entity. [IFRS S1 para 61].

Irrespective of where the information is included, an entity is permitted to include sustainability-related financial disclosures by cross-reference to another report published by the entity, subject to certain requirements. [IFRS S1 App B para B45]. [IFRS S1 App B para B46]. [IFRS S1 App B para B47].

1.3.7 Timing of reporting

In order to align reporting, IFRS S1 requires an entity to publish its sustainability-related financial disclosures and annual financial statements at the same time. In addition, the entity's sustainability-related financial disclosures must cover the same reporting period as is used for financial reporting purposes. [IFRS S1 para 64]. This will help to address the objective of providing primary users with comparable financial and sustainability information.

IFRS S1 does not require entities to disclose interim sustainability-related financial disclosures. If an entity does disclose interim sustainability-related financial disclosures, IFRS S1 does not specify how soon after the interim period this information should be reported. [IFRS S1 para 69]. However, local securities exchanges and other regulators might require an entity to disclose interim sustainability-related financial disclosures. If an entity is required or elects to report interim sustainability-related financial disclosures, it could choose to provide less information at the interim date. [IFRS S1 App B para B48].

PwC observation: Timing of reporting

An entity's sustainability reporting processes and controls might not be as well established as its financial reporting processes and controls. As a result, publishing an entity's sustainability-related financial disclosures at the same time as its financial statements could be challenging for preparers.

IFRS S1 includes transition relief to allow an entity more time to publish its sustainability-related financial disclosures in the first year of adoption. See '4. Transition provisions' for more detail.

1.3.8 Comparative information

Aligned with the requirements for financial reporting, IFRS S1 requires an entity to disclose comparative information in respect of the previous reporting period for all amounts disclosed in the current reporting period. In addition, the standard states that, if it is useful to understand the sustainability-related financial disclosures for the current reporting period, the entity is also required to disclose comparative information for narrative and descriptive sustainability-related information. [IFRS S1 para 70]. There are some transitional provisions provided for the first years of application. These are covered in '4. Transition provisions'.

When any changes occur in the comparative information of an entity's sustainability reporting, refer to '1.3.10 Judgements, uncertainties and errors'.

1.3.9 Statement of compliance

An entity that complies with all of the requirements of the IFRS Sustainability Disclosure Standards is required to include an explicit and unqualified statement of compliance to that effect. [IFRS S1 para 72]. This is different from current practice where companies often prepare sustainability-related financial disclosures that comply with only portions of the relevant sustainability reporting frameworks under which they report.

Any additional disclosure that the entity wants to provide for reasons of interoperability or comparability (including local laws and regulations) which are not required by, or might be deemed unnecessary under, IFRS Sustainability

Disclosure Standards should be clearly highlighted and should not obscure information provided under the IFRS Sustainability Disclosure Standards.

Where local laws or regulations prohibit an entity from disclosing information required by an IFRS Sustainability Disclosure Standard, an entity is permitted to not disclose that information. [IFRS S1 para 73]. The entity is, however, required to disclose the type of information not disclosed and to help users understand the source of the restriction. [IFRS S1 App B para B33]. An entity using this exemption is not prevented from asserting compliance with IFRS Sustainability Disclosure Standards.

IFRS S1 also permits entities, in limited circumstances, to omit information about a sustainability-related *opportunity* that is otherwise required by an IFRS Sustainability Disclosure Standard if that information is commercially sensitive. [IFRS S1 para 73]. There are three requirements that an entity needs to consider before applying this provision:

- (a) “information about the sustainability-related opportunity is not already publicly available;
- (b) disclosure of that information could reasonably be expected to prejudice seriously the economic benefits the entity would otherwise be able to realise in pursuing the opportunity; and
- (c) the entity has determined that it is impossible to disclose that information in a manner—for example, at an aggregated level—that would enable the entity to meet the objectives of the disclosure requirements without prejudicing seriously the economic benefits the entity would otherwise be able to realise in pursuing the opportunity.”

[IFRS S1 App B para B35].

An entity is required to disclose when it is applying this exemption, and to reassess whether the omitted information meets the criteria at each reporting date. [IFRS S1 App B para B36]. It is important to understand that this provision does not apply to sustainability-related risks.

1.3.10 Judgements, uncertainties and errors

1.3.10.1 Judgements

An entity is required to disclose information about the judgements applied that have the most significant effect on its sustainability reporting, apart from those involving estimates (see ‘1.3.10.2 Measurement and outcome uncertainties’) which the entity has made in the process of preparing its sustainability-related financial disclosures. [IFRS S1 para 74]. This includes judgements in identifying sustainability-related risks and opportunities and the related disclosures.

1.3.10.2 Measurement and outcome uncertainties

In the preparation of sustainability-related financial disclosures, there will be times when amounts disclosed cannot be measured directly and can only be estimated. This includes any assumptions about possible future events with uncertain outcomes. In line with financial reporting, the use of reasonable estimates is a crucial part of assessing and disclosing sustainability-related financial information and does not reduce the usefulness of the disclosures, provided that the estimates are accurately described and explained. [IFRS S1 para 79].

If an entity identifies new information in relation to a *prior period estimate*, and the new information provides evidence of circumstances that existed in that prior period, paragraph B50 of IFRS S1 requires the entity to retrospectively correct its comparative amounts in the current year disclosures. In addition, the entity is required to explain the reason for the change in estimate.

An entity is not required to restate the comparative amounts for a change in a forward-looking metric, but the entity is permitted to restate that metric if doing so does not involve hindsight. Forward-looking metrics relate to possible future transactions, events and other conditions. [IFRS S1 App B para B51].

For example, assume that, in 2022, an entity disclosed the estimated amount of potential revenues arising from a sustainability-related opportunity for the next five years (2023–2027) as CU200,000 per annum. In 2023, the entity changes the assumptions used for estimating the annual amount of the potential revenues. Using the new assumptions, the revised estimated amount of potential revenues is CU350,000 per annum for 2024–2027. Applying paragraph B51 of IFRS S1, the entity is permitted, but not required, to restate its comparative disclosures, but it would update its 2023 disclosures to reflect the new estimation approach.

1.3.10.3 Errors

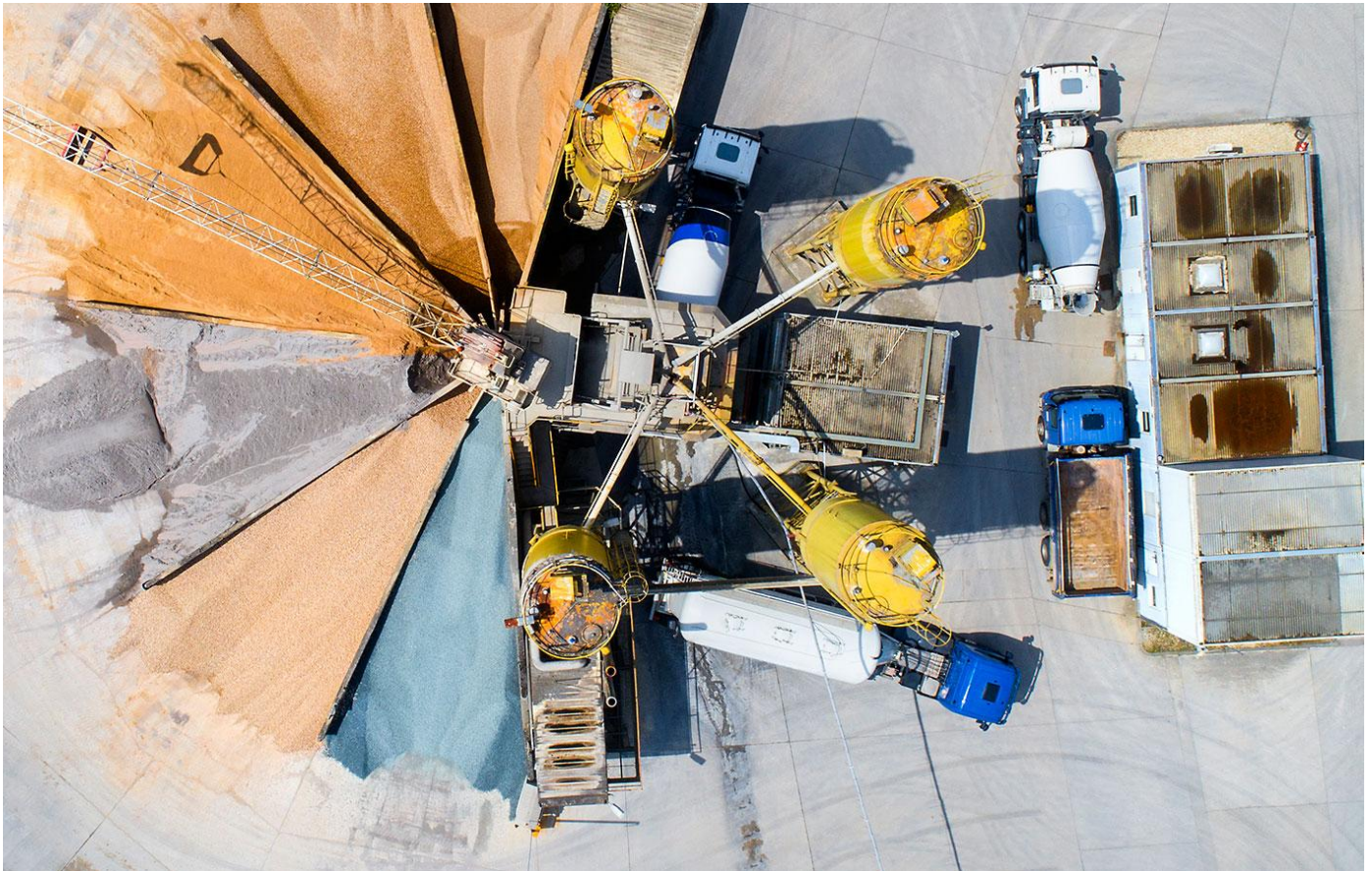
Errors are defined in IFRS S1 in a similar way to IAS 8, 'Accounting policies, changes in accounting estimates and errors', namely:

"omissions from and misstatements in the entity's sustainability-related financial disclosures for one or more prior periods. Such errors arise from a failure to use, or the misuse of, reliable information that was available when the sustainability-related financial disclosures for those periods were authorised for issue and could reasonably be expected to have been obtained and considered in the preparation of those disclosures."

[IAS 8 para 5].

Similar to IAS 8, any prior-period errors should be corrected retrospectively. An entity is required to distinguish between the correction of errors and changes in accounting estimates. [IFRS S1 para 85].

Errors result from the deliberate or accidental misuse of, or disregard for, information that is or should be available. This distinguishes errors from changes to estimates, which are updates to amounts with inherent measurement uncertainty, made to reflect the prevailing circumstances and to take account of the latest information.



2. Climate-related Disclosures (IFRS S2)

2.1 Overview

IFRS S2 builds on the overarching principles in IFRS S1 and is focused on climate-related disclosures. [IFRS S2 para BC5]. An entity is required to identify climate-related risks and opportunities that could affect the entity's prospects over the short, medium and long term. [IFRS S2 para 2]. In identifying these climate-related risks and opportunities, an entity is required to refer to and consider the applicability of the industry-based disclosure topics defined in the 'Industry-Based Guidance on Implementing IFRS S2' (which is based on the climate-related disclosures in the SASB standards). [IFRS S2 para 12].

In addition, paragraph 11 of IFRS S2 requires an entity to use all reasonable and supportable information that is available to the entity without undue cost or effort (see '1.2.1.1 Reasonable and supportable information for more information') when identifying climate-related risks and opportunities.

IFRS S2 identifies two types of climate-related risk: physical risks and transition risks. Appendix A to IFRS S2 defines climate-related physical risks as:

"Risks resulting from climate change that can be event-driven (acute physical risk) or from longer-term shifts in climatic patterns (chronic physical risk). Acute physical risks arise from weather-related events such as storms, floods, drought or heat waves, which are increasing in severity and frequency. Chronic physical risks arise from longer-term shifts in climatic patterns including changes in precipitation and temperature which could lead to sea level rise, reduced water availability, biodiversity loss and changes in soil productivity.

These risks may carry financial implications for entities, such as direct damage to assets, and indirect effects of supply-chain disruption. Entities' financial performance may also be affected by changes in water availability, sourcing and quality; and extreme temperature changes affecting entities' premises, operations, supply chain, transportation needs and employee safety."

Appendix A to IFRS S2 defines climate-related transition risks as:

"Risks that arise from efforts to transition to a lower-carbon economy. Transition risks include policy, legal, technology, market and reputational risks. These risks could carry financial implications for an entity, such as increased operating costs or asset impairment due to new or amended climate-related regulations. The entity's financial performance could also be affected by shifting consumer demands and the development and deployment of new technology."

2.2 Core content

An entity is required to disclose information related to identified climate-related risks and opportunities (see '1.2.1.2 Assessing materiality'). Consistent with IFRS S1, an entity is required to disclose material information relating to the governance, strategy, risk management and metrics and targets associated with its climate-related risks and opportunities.

PwC observation: Avoid duplication

Both IFRS S1 and IFRS S2 include guidance to help entities avoid the duplication of information disclosed. For example, if the oversight of sustainability-related risks and opportunities is managed on an integrated basis, the entity would provide integrated governance disclosures rather than separate disclosures for each sustainability-related risk and opportunity. [IFRS S2 para 6].

This principle can be applied broadly to an entity's sustainability-related financial disclosures to avoid the unnecessary duplication of information, even if not specifically stated in IFRS Sustainability Disclosure Standards. [IFRS S1 App B para B42(b)].

2.2.1 Governance

The governance-related disclosure requirements for IFRS S2 align with the requirements contained in IFRS S1; however, IFRS S2 is specifically focused on climate. For more information, see '1.3.4.1 Governance'.

2.2.2 Strategy

An entity is required to disclose information about its strategy for managing the identified climate-related risks and opportunities. [IFRS S2 para 8]. The requirements include:

- qualitative and quantitative information about the current and anticipated financial effects of climate-related risks and opportunities;
- information on how the entity plans to achieve any climate-related targets; and
- key assumptions in developing a climate-related transition plan.

[IFRS S2 para 14]

An entity is also required to disclose information that enables primary users to understand the resilience of the entity's strategy and business model to climate-related changes, developments or uncertainties. [IFRS S2 para 9]. [IFRS S2 para 22].

When disclosing the anticipated financial effects of climate-related risks and opportunities, similar to IFRS S1 (see '1.3.5 Current and anticipated effects'), there might be some instances where the disclosure requirement could be addressed through qualitative rather than quantitative disclosures, provided that certain criteria are met. [IFRS S2 para 19]. [IFRS S2 para 20].

When disclosing how an entity plans to achieve any climate related targets it has set or is required to meet, it is required to disclose:

- any current and anticipated *direct* mitigation and adaptation activities (for example, the relocation of facilities);
- any current and anticipated *indirect* mitigation and adaptation activities (for example, working with customers and supply chains); and
- how the entity is resourcing, or plans to resource these mitigations and adaptation activities.

[IFRS S2 para 14].

Considering investors and other primary users are increasingly focused on how an entity is mitigating and adapting to climate-related risks, these disclosures are likely to receive scrutiny.

2.2.2.1 Climate-related scenario analysis

Climate-related scenario analysis evaluates a range of hypothetical outcomes of climate-related risks and opportunities by looking at various scenarios under a specified set of assumptions and constraints. Climate-related scenario analysis is not intended to forecast or predict what might happen in the future, but rather to provide information around 'what if' scenarios. For entities which have been reporting using the TCFD framework, scenario analysis might not be new. As part of the strategy-related disclosures, an entity is required to use climate-related scenario analysis to assess the entity's climate resilience using a method that is commensurate with the entity's circumstances as at the reporting date. [IFRS S2 para 22].

Assessing what method is commensurate with the entity's circumstances includes considering the entity's exposure to climate-related risks and opportunities, and also the skills, capabilities and resources available to the entity. The application guidance (paragraphs B1–B18 of IFRS S2) draws on technical supplements published by the TCFD regarding the use of scenario analysis. For example, paragraph B4 of IFRS S2 states that the greater an entity's exposure to climate-related risks or opportunities, the more likely it is that the entity would determine that a quantitative or more technically sophisticated form of climate-related scenario analysis is required. Where an entity's exposure to climate-related risk warrants a more sophisticated approach to scenario analysis, the entity cannot use a lack of skills to justify using a less sophisticated approach if it has the resources available to obtain or develop those skills. [IFRS S2 para BC65].

In other words, the entity is required to use an approach to climate-related scenario analysis that enables it to consider all reasonable and supportable information that is available at the reporting date without undue cost or effort. [IFRS S2 App B para B1]. Refer to '1.2.1.1 Reasonable and supportable information' for more detail on interpreting reasonable and supportable information.

IFRS S2 does not require an entity to use specific scenarios, because this assessment would be based on entity-specific facts and circumstances (for example, the nature and location of an entity's operations, as well as the physical and transition risks to which the entity is exposed). An entity is required to explain which climate-related scenarios it has used and whether a diverse range of climate-related scenarios was used. [IFRS S2 para 22(b)(i)]. In addition an entity is not required to perform a scenario analysis at each reporting date, but rather it is required, at a minimum, to update its climate-related scenario analysis in line with its strategic planning cycle. [IFRS S2 App B para B18]. [IFRS S2 para BC68]. However, an assessment of the entity's resilience is required to be carried out annually.

PwC observation: Climate-related scenario analysis

What is clear from the requirements in paragraph 22(b)(i) of IFRS S2 is that the disclosure of how an entity has carried out its climate-related scenario analysis is essential for primary users to understand the outcomes. Hence the disclosure of the scenario process is equally as important as the disclosure of its outcomes.

2.2.3 Risk management

The required risk management disclosures for IFRS S2 align with the requirements contained in IFRS S1; however, IFRS S2 is specifically focused on climate. For more information, see '1.3.4.3 Risk management'.

2.2.4 Metrics and targets

IFRS S2 requires an entity to disclose information to the primary users on how the entity uses metrics and targets to measure, monitor and manage the identified climate-related risks and opportunities. This includes cross-industry metrics, industry-based metrics (an entity is required to refer to and consider the applicability of IFRS S2 Part B: Industry-Based Guidance on Implementing IFRS S2), metrics and targets set by the entity, and any targets required by law or regulation. [IFRS S2 para 28].

There are seven cross-industry metric categories included in paragraph 29 of IFRS S2, highlighted below, that include both quantitative and qualitative components that entities are required to disclose, if material:

- Greenhouse gas (GHG) emissions (in absolute terms) – measured in accordance with the GHG Protocol Corporate Standard, unless an entity is required by a jurisdictional authority to use a different method. These disclosures are expressed in metric tonnes of CO₂ equivalent.
- Climate-related transition risks – disclosure of the vulnerability of assets or business activities in absolute and percentage terms (for example, the amount and percentage of an entity's revenue from coal mining).
- Climate-related physical risks – disclosure of the vulnerability of assets or business activities in absolute and percentage terms (for example, the amount and percentage of an entity's property portfolio in an area subject to flooding).
- Climate-related opportunities – disclosure of the amount and percentage of assets or business activities aligned with climate-related opportunities (for example, an entity's revenue stream from services that support the transition to a lower-carbon economy).
- Capital deployment – disclosure of the amount used by an entity towards climate-related risks and opportunities (for example, the amount that an entity has invested in research and development for low-carbon products, as a percentage of annual revenue).
- Internal carbon prices – the carbon prices used in emission costing by metric tonne, including how the entity uses that pricing for decision-making.
- Remuneration – the percentage of current period executive management remuneration that is connected to climate-related considerations; additionally, qualitative considerations of how remuneration factors in climate-related considerations.

PwC observation: Sustainability reporting policy

Paragraph 28(a) of IFRS S2 requires an entity to disclose information relevant to the cross-industry metric categories to achieve the objective of enabling users of general purpose financial reports to understand an entity's performance in relation to its climate-related risks and opportunities. This requirement would include the clear disclosure of an entity's sustainability reporting policies (for example, how the entity calculates metrics and sets applicable targets) and is similar to the financial reporting requirements of providing robust accounting policies.

An entity is required to disclose the quantitative and qualitative climate-related targets it has set to monitor progress towards achieving its strategic goals, and any targets required by law or regulation. For each target, the entity shall disclose:

- metrics and approach used to set and review the target;
- the objective of the target;
- whether the target applies to the entire entity or a part of the entity, such as a specific business unit or specific geographical region;
- the period over which the target applies;
- the base period from which progress towards meeting the target is measured;
- whether it is an absolute or intensity-based target; and
- how the latest international agreement on climate change (including jurisdictional commitments) has informed the target.

[IFRS S2 para 33]. [IFRS S2 para 34].

2.2.4.1 GHG emission disclosures

IFRS S2 requires an entity to measure and disclose its Scope 1, Scope 2 and Scope 3 GHG emissions in accordance with the GHG Protocol Corporate Standard, subject to certain transition reliefs (see '4. Transition provisions'):

- Scope 1 – direct GHG emissions that occur from sources that are owned or controlled by the entity (for example, GHG emissions from combustion in the entity's furnaces at its factories).
- Scope 2 – indirect GHG emissions that occur from the generation of purchased electricity, heat or steam that an entity uses (that is, GHG emissions emitted at the facility where the electricity is generated).
- Scope 3 – any other indirect GHG emissions outside Scope 2 that occur upstream and downstream in the entity's value chain (for example, GHG emissions generated from an employee commuting to work).

[IFRS S2 App A]

Paragraph 29(a)(iv) of IFRS S2 requires an entity to separately report its Scope 1 and Scope 2 GHG emissions that relate to the consolidated accounting group (that is, the parent and its subsidiaries) and the emissions that relate to 'other investees'. Other investees include associates, joint ventures and unconsolidated subsidiaries.

When measuring GHG emissions, the standard permits the reporting boundary to be set using either the equity share or the control approach under the GHG Protocol. There is a requirement to clearly disclose the measurement method selected and the reason for choosing that approach. [IFRS S2 App B para B27].

- The equity share approach – the entity proportionally discloses its GHG emissions aligned to the entity's share of equity in the operation. For example, where an entity holds 70% of the equity in an investment, the entity would disclose 70% of the GHG emissions that that investment has generated. This is different from financial reporting where 100% of the entity would be consolidated.
- Control approach – the entity accounts for 100% of the GHG emissions of an investment where the entity controls that investment, and nothing where the entity does not control an investment. Within the control approach, the GHG Protocol allows an election between two models: the financial control model (aligned to the definition of 'control' in financial reporting) and operational control model (where the entity has the authority to introduce and implement its operating policies at the investment). For example, an entity might hold less than 50% of the voting shares in an operation but make key operating decisions, and it therefore has operational control as defined in the GHG Protocol.

Disaggregation of GHG emissions

Paragraph B30 of IFRS S1 prohibits information from being aggregated if doing so would obscure information that is material. This requirement applies to all sustainability-related disclosures, and specifically in the context of IFRS S2 may result in entities disclosing additional disaggregations of their GHG emissions beyond the disaggregation required by paragraph 29 (a)(iv) of IFRS S2.

There are 15 Scope 3 GHG emission categories described in the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard. There is no requirement in IFRS S2 to disaggregate Scope 3 GHG emissions per category, however the illustrative examples indicate that considering the principle in paragraph B30 of IFRS S1, the entity may indeed, at times need to disaggregate its Scope 3 GHG emission by category.

Similarly, although not explicitly required by IFRS S2, considering paragraph B30 of IFRS S1 and the Industry-based Guidance that accompanies IFRS S2, there might be specific situations in which disaggregation by constituent gases could be important. [IFRS S2 para BC100]. However, it is clear that disaggregation by constituent gases is not relevant in all circumstances. [IFRS S2 para BC99].

These are not the only disaggregation of emissions that could be provided, and the entity's own facts and circumstances will need to be considered when determining what information in relation to emissions it should disaggregate.

Joint operations and 'unconsolidated structured entities'

The ISSB acknowledged that the use of different approaches to include GHG emissions for investments in other entities might not align with how information is provided in an entity's financial statements about these investments. [IFRS S2 para BC101].

Paragraph 29(a)(iv) of IFRS S2 requires an entity to separately report its Scope 1 and Scope 2 GHG emissions for the consolidated accounting group and 'other investees'. Paragraph BC103 of IFRS S2 clarifies that any Scope 1 and Scope 2 GHG emissions related to joint operations are required to be included in the consolidated accounting group and not as part of 'other investees'.

No guidance is provided regarding where to include emissions related to unconsolidated structured entities (as defined in IFRS 12 – Disclosure of interests in other entities), in which case an entity can include the associated GHG emissions with 'other investees' in the application of paragraph 29(a)(iv) of IFRS S2. This would further align sustainability and financial reporting disclosures.

Disaggregation of consolidated accounting group and 'other investees'

Example 1 in the illustrative examples in IFRS S2 clarifies that the disaggregation between the consolidated accounting group and 'other investees' as required by paragraph 29(a)(iv) of IFRS S2 is based on the perspective of the investee. [IFRS S2 para IE5 Table 1]. [IFRS S2 para BC102]. That is, other investees' Scope 1 GHG emissions are those direct GHG emissions that occur from sources that are owned or controlled by other investees (not sources that are owned or controlled by the consolidated accounting group).

For each GHG emission target disclosed, an entity is required to disclose:

- whether Scope 1, Scope 2 or Scope 3 GHG emissions (including which GHG gases) are covered by the target;
- whether it is a gross or net GHG emissions target (if the entity only has a net GHG emissions target, the associated gross GHG emissions target is required to be disclosed);
- whether the target was informed based on a specific sector's decarbonisation approach; and
- the planned use of carbon credits to offset GHG emissions to meet any net GHG emission targets, including:
 - whether it relates a nature-based or technological carbon removal;
 - which third-party will verify the carbon credit; and
 - any other factors to help users understand the credibility and integrity of the carbon credit.

[IFRS S2 para 36].

There are additional disclosure requirements regarding Scope 3 financed emissions if an entity is engaged in asset management, commercial banking or insurance.

3. Effective date

IFRS S1 and IFRS S2 are effective for annual reporting periods beginning on or after 1 January 2024, with early adoption permitted. However, entities are permitted to report the requirements in IFRS S1 only to the extent that they relate to the disclosure of climate-related information in the first year of adoption. [IFRS S1 App E para E5]. The application of IFRS S2 is unaffected.

An entity would be required to provide information under IFRS S1 about its other sustainability-related risks and opportunities in the second year that it applies IFRS Sustainability Disclosure Standards. This will allow entities time to build capacity necessary to report consistent, complete, comparable and verifiable sustainability-related financial disclosures.



4. Transition provisions

The ISSB has provided multiple transitional reliefs to assist entities in applying IFRS Sustainability Disclosure Standards:

- Timing of reporting – an entity is permitted to publish its first sustainability-related reporting within nine months of the end of the annual reporting period. In the second year after adopting IFRS Sustainability Disclosure Standards, an entity would follow the requirements in ‘1.3.7 Timing of reporting’. [IFRS S1 App E para E4].
- Comparative information – an entity is not required to report comparative information in the first annual reporting period in which it applies IFRS Sustainability Disclosure Standards. [IFRS S1 App E para E3]. [IFRS S2 App C para C3].
- GHG emissions measurement – where an entity has been using a GHG emissions measurement method that is different from the GHG Protocol Corporate Standard, the entity is permitted to continue to use that other measurement method in the first year of application. [IFRS S2 App C para C4(a)].
- Scope 3 GHG emissions – an entity is not required to disclose Scope 3 GHG emissions in the first year of applying IFRS Sustainability Disclosure Standards. [IFRS S2 App C para C4(b)].

PwC observation: Subsequent events

Impact of transitional reporting timeline on subsequent events

Paragraph 67 of IFRS S1 requires an entity to provide information about sustainability-related risks and opportunities, that could affect an entity’s prospects over the short, medium or long term, that arose after the end of the reporting period but before the sustainability-related financial disclosures are authorised for issue. These disclosures are only required if the non-disclosure could reasonably be expected to influence decisions that the primary users make.

Entities could elect to publish their first sustainability reporting up to nine months following the end of the reporting period. This is a significant period over which entities need to consider subsequent events. Entities electing to take advantage of some or all of the additional nine months will need to continue to track events after the reporting period and before the sustainability-related financial disclosures are authorised for issue.



5. Disclosures in the absence of specific guidance

PwC observation: Subsequent events

As its name indicates, IFRS S1 provides the general requirements for the disclosure of sustainability-related financial information; however, there are many common presentation and measurement questions, such as how to reflect acquisitions and divestitures, that are not explicitly addressed in the IFRS Sustainability Disclosure Standards.

There will be times when there is limited or no guidance in the IFRS Sustainability Disclosure Standards for a specific situation. From a financial reporting perspective, IAS 8 provides guidance on addressing transactions, other events and conditions in the absence of a specific IFRS standard providing authoritative guidance. While there is no comparable guidance within the IFRS Sustainability Disclosure Standards, the hierarchy of alternative sources of guidance in IAS 8 provides a reasonable approach.

In the absence of specific guidance, IAS 8 prioritises accounting principles for similar transactions or events within IFRS and then within US GAAP. Following a similar approach for sustainability reporting might result in useful information to the users of sustainability reporting. As a result, in the absence of authoritative guidance in the IFRS Sustainability Disclosure Standards, an entity could consider applying the principles of its own financial reporting framework to sustainability reporting if there is a natural symmetry between financial and sustainability reporting. In addition, following the IAS 8 approach, an entity could look to other sustainability reporting frameworks that use a similar conceptual framework to develop an approach that does not conflict with the IFRS Sustainability Disclosure Standards.

For example, leveraging the well-understood financial reporting methodology for making assumptions with respect to reporting boundaries or changes in group structure will likely reduce complexity for preparers and users alike. The financial reporting principle of reporting acquisitions from, and dispositions to, the date of the transaction is likewise a reasonable approach for sustainability disclosures.



6. Next steps

The Board is now thinking about the next thematic standards that will build on IFRS S1. Prior to the issuance of IFRS S1 and IFRS S2, the ISSB published a consultation on [agenda](#) priorities, asking for input on the next thematic standards and their relative priority compared to other projects. This will help to formulate their work plan for the next two years. The exposure draft on agenda priorities closes for comments on 1 September 2023.

7. Contacts

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