
ISSB meeting

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Project	Biodiversity, ecosystems and ecosystem services research project Human capital research project
Topic	Overview: Jurisdictional survey on biodiversity, ecosystems and ecosystem services and human capital
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Purpose

1. The purpose of this paper is to provide the International Sustainability Standards Board (ISSB) with an overview of the feedback received from the jurisdictional survey on the ISSB's research projects on biodiversity, ecosystems and ecosystem services (BEES) and human capital, including:
 - (a) a summary of the survey respondents;
 - (b) the key themes identified that relate to one or both research projects; and
 - (c) how the survey responses can inform next steps in the ISSB's research.
2. The staff will also provide the ISSB with an oral update on the related SSAF discussion held on 21 October 2024.
3. This is not a decision-making paper, however the staff welcomes input from the ISSB on the proposed next steps and how the responses to the jurisdictional survey can help to inform further research.

Structure

4. This paper covers:
 - (a) the context including the survey questions asked (paragraphs 5-9);
 - (b) the key takeaways and proposed next steps (paragraphs 10-19);
 - (c) a summary of results and characteristics of requirements (paragraphs 20-34):
 - (i) on BEES (paragraphs 23-27); and
 - (ii) on human capital (paragraphs 28-34).
 - (d) informing further research (paragraphs 35-43):
 - (i) existing standards and frameworks (paragraphs 36-38);
 - (ii) investor interest (paragraphs 39-41);
 - (iii) current state of disclosure (paragraph 42); and
 - (iv) enhancements to the SASB Standards (paragraph 43).

Context

5. In April 2024, the ISSB decided to add research projects on risks and opportunities associated with BEES and human capital to its work plan. The ISSB also decided that, in carrying out this work, it would consider how to pursue approaches that would build on existing standards and frameworks and promote interoperability between its own global baseline of sustainability-related financial disclosures and other widely used standards and frameworks, including understanding the existing requirements used in jurisdictions globally¹.
6. In June 2024 the ISSB staff engaged the Sustainability Standards Advisory Forum (SSAF) on how its members could initially support and contribute to the research projects on BEES and human capital. The staff explained that understanding the existing reporting requirements in jurisdictions is an important component of the

¹ See ISSB *Updates*: [February 2024](#), [March 2024](#) and [April 2024](#).

ISSB's initial research. Therefore, the staff distributed a survey to the SSAF members to further inform the initial research.

7. The jurisdictional survey was distributed to the SSAF members in August 2024. SSAF members were also encouraged to engage with their own relevant stakeholders to solicit a broader response, for example, through the regional bodies and through the International Organisation of Securities Commissions (IOSCO) who are also represented on the SSAF. The staff received 26 responses to the survey. For an overview of the respondents, see Appendix A and for a regional breakdown of the respondents see Appendix B.
8. The staff designed the survey and analysed the findings to meet a particular research objective: to identify whether jurisdictions have existing (or are developing) reporting requirements relating to BEES and human capital, and, if so, to obtain an understanding of those requirements and the extent to which those requirements might provide investors with decision-useful information.

Survey questions

9. The survey covered both existing and upcoming jurisdictional BEES and human capital-related disclosure requirements. The survey also asked jurisdictions if they have conducted or are in the process of conducting research related to the topics that might be useful to inform the ISSB's own research. In particular, the survey asked:
 - (a) Existing requirements: Do you or any other relevant authorities in your jurisdiction have existing corporate disclosure requirements relating to nature and/or workforce issues? Who is the intended audience for the disclosures generated by the requirements?
 - (b) Upcoming requirements: Do you or any other relevant authorities in your jurisdiction have upcoming corporate disclosure requirements relating to nature and/or workforce issues?

- (c) Other relevant research: Have you (or another authority in your jurisdiction) conducted additional research related to nature and/or workforce issues that could be useful to inform the ISSB's research projects?

Key takeaways and proposed next steps

10. The key takeaways for both topics and the proposals about how this information can further inform the ISSB's research including through further jurisdictional engagement are summarised below. A key point to note from the information received across both topics is the evident prevalence of requirements that exist in jurisdictions today and how those requirements vary. This has been coupled with some respondents highlighting that they are closely monitoring relevant international developments on both topics, including the work of the ISSB.

BEES

11. Most responding jurisdictions have BEES-related disclosure requirements in place. Almost all of these requirements are mandatory. Most requirements are generally applicable to entities regardless of their industry, while one jurisdiction uses an industry-based approach. Some jurisdictions have explained that their requirements are intended solely to provide information designed for investor use with others highlighting requirements for entities to provide information intended for use by both investors and other stakeholders. The requirements cover a variety of BEES-related topics, with water, waste, and biodiversity being the most common. Most of them require a mix of quantitative and qualitative disclosure.
12. There are no significant differences in the BEES-related topics covered by requirements providing information intended for use by investors when compared to those designed to provide information intended for use by a broader range of stakeholders. This is a key area where the staff will undertake further research, informed by bilateral discussions with respondents, to assist in identifying the investor relevant information.

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13. Many of the respondents noted that regulatory requirements for BEES-related issues are under consideration, with many jurisdictions monitoring the evolution of global initiatives, including the work of the ISSB and a few respondents specifically highlighting the work of the Taskforce on Nature-related Financial Disclosures (TNFD).

Human capital

14. Almost all responding jurisdictions have existing disclosure requirements covering human capital-related topics. Almost all these requirements are mandatory and some of the requirements are highlighted as being specifically investor-focused.
15. The requirements cover a wide range of human capital-related topics, including wellbeing, health and safety of the workforce, diversity and inclusion, employee engagement, workforce investment, the alternative workforce, labour conditions in the value chain, and workforce composition and costs. Although there is commonality in topics among jurisdictions, many of the requirements ask for different types of information.
16. The topics most commonly covered in the investor-focused requirements are diversity and inclusion, pay and benefits, training and development, and wellbeing, health and safety of the workforce. The jurisdictional requirements intended to serve a broader range of stakeholders' information needs cover all of these topics plus additional topics.
17. A few respondents cited upcoming amendments or enhancements to existing regulation in relation to human capital and some mentioned they will monitor the developments of global reporting standards, including the work of the ISSB.

Proposed next steps

18. Informed by the feedback received to the survey, the staff intends to conduct further bilateral engagement with respondents to develop further understanding of where standard-setting may be needed and to identify potentially relevant disclosures to

incorporate into the proposed global baseline on BEES and human capital. This will be further informed by identifying:

- (a) the intended audience for the disclosures; to further understand where there are specific requirements to provide investor relevant information;
- (b) the jurisdictional research activities and related outcomes that may be useful to inform ISSB research; and
- (c) whether the content has particular relevance to some industries.

19. The staff will utilise the information gathered through the survey to further inform its research. For example:

- (a) information on existing jurisdictional requirements will further inform research on the current state of BEES- and human capital-related disclosure; and
- (b) ongoing jurisdictional research can inform and complement the ISSB research on, for example, decision useful information for investors and the state of disclosure.

Summary of results and characteristics of requirements

20. Of the 26 respondents (see Appendix A), almost all confirmed that their jurisdiction currently requires companies to disclose information related to BEES and/or human capital. Most jurisdictions with existing requirements have requirements that cover both topics. However, a few jurisdictions have only human capital-related requirements and one has only BEES-related requirements.
21. Notably, most of the requirements cited by respondents are mandatory in nature and promulgated by securities regulators. Almost all of the existing jurisdictional requirements are applicable to listed companies with over half applying to listed companies only. Most respondents highlighted that their requirements are intended to provide the disclosure of information to meet the information needs of both investors and other stakeholders. The staff notes that it will be particularly important in follow-

up engagements with the respondents to identify how decisions are made in practice about which information is relevant for investors or broader stakeholders, to further inform the ISSB's research to identify existing investor-relevant disclosures. Of the survey respondents:

- (a) a few jurisdictions have identified mandatory requirements that are intended to provide disclosures designed to meet the information needs of investors. All of these jurisdictions have existing requirements related to both BEES and human capital, except for Japan which currently requires investor-focused disclosure only on human capital. In addition, one respondent (Chile), requires the use of SASB Standards.
 - (b) many jurisdictions have mandatory requirements that are intended to provide disclosure to meet the information needs of investors and other stakeholders. Of these jurisdictions, most require both BEES- and human capital-related disclosures.
22. Most BEES- and human capital-related requirements were implemented since 2020, although some other were implemented in the 2010s.

BEES key themes

23. Most of the responding jurisdictions, including, for example, the European Union (EU), China, India and South Korea, have existing disclosure requirements covering BEES-related topics. Almost all of these BEES-related requirements are mandatory. Most requirements ask for both qualitative and quantitative information. Some jurisdictions have no existing requirements that are explicitly BEES-related, including Canada, Australia, Japan and Brazil.
24. The majority of BEES-related disclosure requirements have been implemented since 2020, while the others were implemented in the 2010s. Of those jurisdictions with existing BEES-related requirements, some have requirements that do not explicitly require information about specific BEES-related topics, but they require disclosure

about, for example, environmental policies and guidelines, and environmental performance or operating results.

25. Most jurisdictions have existing disclosure requirements with explicit mention of BEES-related topics. In particular:
- (a) many jurisdictional requirements, including those in China, India, Hong Kong, the EU, and the United Kingdom (UK), cover several categories of BEES-related topics, such as those related to water, land, air, biodiversity, waste, resource use and circularity;
 - (b) some jurisdictions cited requirements with more targeted coverage of BEES-related topics. For example, South Korea covers water (use, recycling and pollution), air pollution, raw material use and waste (generation and recycling); Singapore covers water consumption, waste generation and energy use; and Mexico covers water, land use in proximity of key biodiversity areas, and waste generation; and
 - (c) Chile has in place industry-specific requirements in accordance with the SASB Standards, which cover BEES-related topics.
26. Water and waste are the two most commonly covered topics in the existing BEES-related jurisdictional requirements, followed by biodiversity. Of the jurisdictions with BEES-related requirements:
- (a) most cover the topic of water. Almost all of these requirements cover disclosures related to water quantity, meaning water use, consumption and/or intensity, with many of these also covering water reuse or recycling. Three respondents, South Korea, Hong Kong and the EU, have requirements that cover water pollution, and two respondents, China and the EU, require information about marine resources and ecosystems. Finally, Mexico, India, the EU and the UK require disaggregated metrics for water-stressed (or water-scarce) areas.

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- (b) most address the topics of waste, circularity and/or resource use. Most of these requirements cover waste generation and management, requiring metrics on waste produced and related treatments (for example, disposal, recycling, reuse), and/or type of waste (for example, hazardous waste). Most also cover topics related to the use of resources, for example use of raw materials (ranging from minerals, fossil fuels, metals, and biomass by the UK, and water, energy and other raw materials by Hong Kong), and sustainable sourcing, with EU and China requiring information on circular economy-related activities.
 - (c) most cover the topic of biodiversity. Most of these requirements explicitly address an entity's impacts on biodiversity and ecosystems. All of them are intended to provide information to both investors and other stakeholders. The EU and China also require information about the entity's contribution to the conservation and restoration of biodiversity and ecosystems. Three jurisdictions require location-specific disclosure, including information on activities located in proximity to biodiversity-sensitive areas (for example Mexico requires information about land use within or near biodiversity risk areas).
 - (d) many cover disclosure related to land use, land-use change and land pollution. Most of these requirements cover land use and land-use change, and require information about, for example, land use near biodiversity sensitive areas or protection and conservation of key land. Most of them also require information on emissions or discharge of pollutants into land or soil.
 - (e) many also cover emissions into the air beyond greenhouse gases.
 - (f) some require information about the use of energy (for example, energy consumption and/or intensity).
27. Many of the respondents noted that regulatory disclosure requirements for BEES-related issues are under consideration and many are monitoring the evolution of global initiatives, including the work of the ISSB. A few mentioned they are conducting

work to develop new standards (for example, the EU in relation to standards for Small and Medium Sized Entities (both listed and non-listed)) or to update existing requirements (for example, Panama).

Human capital key themes

28. Almost all jurisdictions, including, for example, Australia, Brazil, the EU, India, Hong Kong and the UK, have existing disclosure requirements covering human capital-related topics. Singapore was the only jurisdiction surveyed that does not have existing requirements explicitly covering human capital. Almost all of these requirements are mandatory. Most jurisdictions require both qualitative and quantitative disclosure on human capital-related topics.
29. Of the jurisdictions with human capital-related requirements, most have been implemented or updated in recent years (since 2020). Some requirements were implemented in the 2010s and a few were implemented in the 1990s and 2000s.
30. There is a wide range of human capital-related topics covered in the existing requirements, including wellbeing, health and safety of the workforce, diversity and inclusion, employee engagement, workforce investment, the alternative workforce, labour conditions in the value chain, and workforce composition and costs.
31. Of the jurisdictions with human capital-related disclosure requirements:
 - (a) most have diversity and inclusion-related disclosure requirements. Within those requirements, the most common metric is a gender breakdown of the workforce. A few jurisdictions explicitly require the gender breakdown for board or executive-level employees and at the employee or workforce level. Information is required about gender-related pay differences in Australia, the EU, Japan and the UK. In addition to gender-related information, a few jurisdictions such as Canada, the EU and the UK also require information on policies related to employment of disabled persons.

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- (b) many require the disclosure of information about the pay and benefits of the workforce. For example, Brazil, China, India, Hong Kong and South Korea require details of remuneration and compensation practice and policies.
 - (c) many require the disclosure of information about the wellbeing, health and safety of the workforce. The most common requirements related to health and safety include disclosure of policies to ensure a safe working environment and to protect workers from occupational hazards, which is required by jurisdictions such as Brazil, the EU, Hong Kong, India and Indonesia.
 - (d) many require the disclosure of information about training and development of the workforce. For example, Brazil, Chile, the EU, India and Indonesia require information about details of workforce training on topics such as human rights issues and career development.
 - (e) some require the disclosure of information about workforce composition. The common metric from these jurisdictions is number of full-time employees and non-full time employees. Different terminologies are used across jurisdictions, such as permanent employees, temporary or contract employees, part-time workers, outsourced employees, dispatch or subcontracted workers, service workers and non-guaranteed hours employees. Brazil and Canada also require disclosure of workforce information by hierarchical level or director-level.
 - (f) some require the disclosure of information about working conditions in the value chain, such as information about how the entity is managing child labour, forced labour and/or modern slavery in its supply chain. Example jurisdictions include Australia, Canada, the EU, Hong Kong and the UK. In addition, Australia and Canada require entities to disclose actions or measures taken to combat child labour, forced labour and/or modern slavery issues.
 - (g) some cover broader disclosure requirements such as strategy, governance and risk management related to human capital. Jurisdictions, such as Argentina, the EU and the UK have governance-related requirements, which include descriptions of workforce-related policies, corporate governance, and the board's activities to monitor and oversee human capital-related issues. Risk

management-related requirements include information on risk management processes and social impact assessments, identification of legal risks and how those affect the entity's business. Those jurisdictions that explicitly highlighted risk management-related requirements include Dubai, the EU, India, Kuwait and the UK. Other requirements include disclosure of information about human capital-related strategies and compliance indicators related to workers.

32. From the information received, the least frequently covered topics for disclosure were the 'just transition' to a low-carbon economy, grievance mechanisms, and worker voice and representation. In particular:
- (a) Disclosure related to 'just transition' is explicitly covered only in European Sustainability Reporting Standards (ESRS).
 - (b) Mentions of grievance mechanisms are found in Australia, the EU and India. The requirements include information about whistleblower policies and disclosure of complaints made by employees.
 - (c) Disclosures about workers voice and representation requirements were identified by respondents in Argentina, Brazil, the EU and the UK. The requirements include information on how an entity engages and communicates company culture with employees and relations between union workers.
33. Among respondents, only Chile explicitly requires the disclosure of human capital-related information by companies in particular industries. Chile requires disclosure in accordance with the SASB Standards. In addition, Canada requires disclosure from federal corporations and federally regulated industries on workforce composition and diversity and inclusion topics.
34. A few respondents cited upcoming amendments or enhancements to existing requirements in relation to human capital (for example, Chile and Hong Kong). For example, Chile and Hong Kong are working on revisions to guidance on reporting,

including on workforce-related topics. Some jurisdictions mentioned they will monitor the developments of reporting standards, including the work of the ISSB.

Informing further research

35. The staff will undertake further research to build upon the focus areas outlined in Agenda Paper 2B from the July 2024 ISSB meeting. That research will be further informed by the responses received to the jurisdictional survey.

Existing standards and frameworks

36. As the jurisdictional survey has highlighted several potentially relevant reporting requirements, an area for further exploration would be a more detailed analysis of the nature of these requirements. The staff has identified the following areas in which additional analysis may be additive:
- (a) conducting a more granular assessment of the nature and content of individual jurisdictional reporting requirements;
 - (b) comparing jurisdictional reporting requirements to each other; and
 - (c) comparing jurisdictional reporting requirements to non-jurisdictional existing standards and frameworks.
37. For both BEES and human capital, the staff will focus as appropriate on the following factors within and across the requirements:
- (a) whether investors are the target audience of the required disclosures;
 - (b) whether and to what extent requirements are topic specific, including which topics are covered and where there are gaps;
 - (c) whether the requirements relate to companies' direct operations, the value chain, or both; and
 - (d) whether the requirements cite other standards and frameworks and if so, the specific frameworks mentioned.

38. For human capital, these analyses could also consider:

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- (a) whether requirements are workforce-specific or workforce-inclusive (ie, whether the requirements ask for information that is exclusively about the workforce, or for information that applies to, but also goes beyond, the workforce).

Investor interest

39. The jurisdictional survey results have provided further information in relation to investor interest in BEES and human capital-related information across several dimensions. These include the potential availability of such information to investors, differences across geographic regions and potential areas where there may be data gaps or challenges in accessing information. This information can inform investor engagement activities by highlighting questions relating to the differences among the jurisdictions in which they invest and the extent to which they are challenged by such fragmentation.
40. To identify where jurisdictional requirements are providing investors with decision-useful information, a potential further area for exploration would be a comparison of the findings from the investor interest workstream with the content and nature of jurisdictional requirements.
41. Using the detailed analysis of the content of jurisdictional requirements, further research relating to investor interest could specifically explore:
- (a) whether jurisdictional standards cover the topics investors have stated are priorities; and
 - (b) whether the most important metrics cited by investors are included in jurisdictional standards.

Current state of disclosure

42. The jurisdictional survey can assist as a starting point to validate broader jurisdictional trends that may emerge from the staff analysis of current practices on BEES- and human capital-related disclosure based on published corporate reports. Additionally, the survey respondents have shared research that they're currently conducting that

relates to BEES and human capital topics, including analysis of disclosures from jurisdictional companies. These pieces of research could inform and complement the findings from our primary internal analysis.

SASB enhancements

43. The research projects on risks and opportunities associated with BEES and human capital are highly interconnected with the work to further enhance the SASB standards. Therefore, this survey and related outcomes are useful to establish further engagement on industry-specific disclosure, including with the SSAF.

Appendix A – Overview of respondents

Organisation	Jurisdiction	Region
Comisión Nacional de Valores	Argentina	Latin America & the Caribbean
Australian Securities and Investments Commission	Australia	Asia-Oceania
Securities and Exchange Commission of Brazil	Brazil	Latin America & the Caribbean
Financial Reporting and Assurance Standards Canada	Canada	North America (excl Mexico)
Financial Market Commission of Chile	Chile	Latin America & the Caribbean
China Securities Regulatory Commission	China	Asia-Oceania
Dubai Financial Services Authority, Dubai, UAE	Dubai	Asia-Oceania
Finantsinspektsioon (Estonian Financial Supervision and Resolution Authority)	Estonia	Europe
European Commission (response coordinated with EFRAG)	EU	Europe
Hong Kong Securities and Futures Commission	Hong Kong	Asia-Oceania
Securities and Exchange Board of India	India	Asia-Oceania
Financial Services Authority (OJK Indonesia)	Indonesia	Asia-Oceania
Financial Services Agency	Japan	Asia-Oceania
Capital Markets Authority	Kenya	Africa
Korea Sustainability Standards Board	South Korea	Asia-Oceania
Capital Markets Authority-Kuwait	Kuwait	Asia-Oceania
Malta Financial Services Authority	Malta	Europe
Deloitte	Mexico	Latin America & the Caribbean
Consejo Mexicano de Normas de Información Financiera	Mexico	Latin America & the Caribbean

Organisation	Jurisdiction	Region
Superintendency of the Securities Market of Panama	Panama	Latin America & the Caribbean
Qatar Financial Centre Regulatory Authority	Qatar	Asia-Oceania
Monetary Authority of Singapore	Singapore	Asia-Oceania
Securities Market Agency Slovenia	Slovenia	Europe
Securities and Exchange Commission, Thailand	Thailand	Asia-Oceania
Financial Reporting Council (with input from the Financial Conduct Authority)	United Kingdom	Europe
National Securities and Stock Market Commission, Ukraine	Ukraine	Europe

Appendix B – Regional breakdown of respondents

