



## GLASS comment letter on the Exposure Draft: Proposed amendments to the SASB Standards

Buenos Aires, Argentina, 13 November 2025

International Sustainability Standards Board  
IFRS Foundation  
Columbus Building  
7 Westferry Circus  
Canary Wharf, London E14 4HD  
United Kingdom

**RE: Exposure Draft: Proposed amendments to the SASB Standards**

Dear members of the International Sustainability Standards Board (ISSB):

The “Group of Latin American Accounting Standard Setters” – GLASS<sup>1</sup> welcomes the opportunity to provide comments on the Exposure Draft: **Proposed amendments to the SASB Standards (the ED)**.

This response summarizes the points of view of the members of the various countries of GLASS and has been prepared in accordance with the following due process.

### **Due Process**

The discussions regarding the ED were held within the Permanent Sustainability Commission (la Commission) created in April 2022, which is comprised of representatives from GLASS member organizations to analyze exposure drafts under consultation by the International Sustainability Standards Board (ISSB). GLASS member countries participate through their representatives, who possess proven experience in the study and application of sustainability standards and International Financial Reporting Standards.

The Commission's deliberations focused on the questions posed in the draft standards, thoroughly analyzing their content.

Each member of the Commission had the opportunity to express their views on the implications of implementing the proposed modifications in their country and the impact of the adjustments for greater international applicability.

The Commission focused its efforts on analyzing and discussing in depth questions 1.a); 2.a); 2.c); 4.c); 4.d) and 5, whose conclusions are summarized in the annex to this comment letter, which was presented to the GLENIF Board of Directors, who carried out their discussion and subsequent approval.

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<sup>1</sup> The overall objective of the Group of Latin American Accounting Standard Setters (GLASS) is to provide technical contributions in reference to all Exposure Drafts, Requests for Information and Discussion Papers published by the IFRS Foundation Boards and Tentative Agenda Decisions of the IFRS Interpretations Committee. GLASS therefore intends to have a single regional voice before the IFRS Foundation Boards. GLASS is constituted by: Argentina (Chair), Bolivia, Brazil (Board), Chile, Colombia (Board), Costa Rica (Board), Dominican Republic, Ecuador, Guatemala, Honduras, Mexico (Board), Panama, Paraguay, Peru (Board), Uruguay (Board) and Venezuela (Vice Chair).



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### **General Comments**

GLASS agrees that the proposed amendments to the SASB standards are necessary to include the effects of certain factors such as biodiversity, ecosystems and ecosystem services and human capital on corporate finances, and that the resulting information is required by investors.

### **Specific Comments**

In addition to including our responses and comments electronically using the online survey, we have attached an Annex in which you can see in detail the answers to the questions formulated in the Project.

### **Contact**

If you have any questions about our comments, please contact us at [glenif@glenif.org](mailto:glenif@glenif.org).

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Hernán P. Casinelli'.

**Hernán P. Casinelli**

**Chair of the Group of Latin American Accounting Standard Setters (GLASS)**



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### ANNEX - Proposed amendments to the SASB Standards

#### QUESTION 1—OBJECTIVE

**Question 1.a) - Do you agree with the objective of the proposed amendments to the SASB Standards and related areas of focus?**

##### Response

GLASS agrees with the objective of the proposed modifications, as they will help to better implement the standards issued by the ISSB when entities rely on the SASB Standards for disclosures required by the ISSB Standards.

#### QUESTION 2—ENHANCEMENTS TO INTEROPERABILITY WITH OTHER STANDARDS AND FRAMEWORKS

**Question 2.a) - Do you agree with the proposed approach to enhancing interoperability and alignment with other sustainability-related standards and frameworks? Why or why not?**

##### Response:

GLASS agrees, as this facilitates implementation where entities must comply with more than one readiness framework. However, GLASS is aware of a growing concern among companies about how to integrate local regulatory frameworks with the application of the ISSB Standards.

**Question 2.c) - Could the interoperability and alignment of any disclosure topics or metrics be further enhanced while achieving the objectives of improving the decision-usefulness and cost-effectiveness of the information? What amendments would you propose and why?**

##### Response:

GLASS proposes analyzing the incorporation of the TNFD (Task Force for Nature-related Financial Disclosures) standards in the review addressed in question 4.

#### QUESTION 4—INFORMATION RELATED TO BIODIVERSITY, ECOSYSTEMS AND ECOSYSTEM SERVICES AND HUMAN CAPITAL

**Question 4.c) - Do the SASB Standards, including the proposed amendments, enable entities to provide decision-useful information about their human capital-related risks and opportunities to users of general purpose financial reports? Why or why not?**

##### Response:

GLASS believes that the SASB Standards included in the proposed modifications do not allow for achieving this objective. These proposals address occupational health and safety, while the human capital trend includes talent management and retention, given that staff turnover would



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impact the organization's finances. It is also important to understand, among other things, the return on investment in training.

**Question 4.d) - In the nine industries that the ISSB has prioritised for enhancement in the Exposure Draft, are there other human capital-related disclosures not addressed through the proposed amendments that would be useful for users of general purposes financial reports in their decision-making? If so, please explain which disclosures and why.**

**Response:**

GLASS already gave examples in its response to question 4-c). We refer you to it.

### QUESTION 5—EFFECTIVE DATE

**Question 5 -** The ISSB proposes to set an effective date for the amendments that will occur between 12 and 18 months after their issuance and permits early application. The ISSB's rationale for this proposal can be found in paragraph BC161 of the Basis for Conclusions.

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

**Response:**

GLASS proposes that the implementation period be between 18 and 24 months after the publication of the modifications. This is because sufficient time will be needed to train staff from the various stakeholders, assess impacts, and make general and specific changes to ensure effective implementation. Furthermore, GLASS agrees that early implementation should be permitted, as this allows entities with a greater capacity to respond quickly to these challenges to implement the changes as soon as possible without limitations.