

Ian Carruthers
Chair
International Public Sector Accounting Standards Board
277 Wellington Street West
Toronto
ON M5V 3H2
Canada

21 February 2025

Dear Mr. Carruthers,

Subject: Sustainability Reporting Standards Exposure Draft

The International Corporate Governance Network (ICGN) appreciates the opportunity to comment on the International Public Sector Accounting Standards Board (IPSASB) Sustainability Reporting Standards Exposure Draft 1, *Climate-related Disclosures*.

Led by investors responsible for assets under management of >US\$90 trillion, ICGN is an authority on global standards of corporate governance and investor stewardship. Headquartered in London, our membership is based in more than 40 countries. ICGN's *Global Governance Principles* and *Global Stewardship Principles*, written from an investor perspective, are widely used by our members in their company assessments and voting decisions, and by regulators when developing corporate governance rules.

ICGN supports the International Sustainability Standards Board's (ISSB) mission to develop a global baseline of sustainability-related corporate disclosures.¹ In May 2024, ICGN, alongside 121 investors, companies, industry associations and stock exchanges have signed on to a call for commitment from relevant authorities across jurisdictions to adopt the ISSB Standards.² So far, jurisdictions representing over half the global economy by GDP announced steps to adopt or use the ISSB Standards.³

We welcome the IPSASB's efforts to develop public sector sustainability reporting standards for climate-related disclosures based on the ISSB Standard IFRS S2. To ensure comparability of information, we encourage the IPSASB to adopt the ISSB Standards without substantial modifications, to the greatest extent possible.

Thank you again for the opportunity to share our perspective. We would be delighted to discuss this further you, should you be interested in a meeting.

Yours faithfully,



Jen Sisson
Chief Executive Officer, ICGN

¹ ICGN Letters "[Inaugural global sustainability disclosure standards, International Sustainability Standards Board \(ISSB\)](#)" (26 June 2023)

² PRI, London Stock Exchange Group, UN Sustainable Stock Exchanges initiative, World Business Council for Sustainable Development, "[Call to Action: ISSB Global Adoption](#)" (22 May 2024)

³ IFRS Foundation, "[Jurisdictions representing over half the global economy by GDP take steps towards ISSB Standards](#)" (28 May 2024)