



MALAYSIAN INSTITUTE  
OF ACCOUNTANTS

26 November 2025

Mr Emmanuel Faber  
ISSB Chair  
IFRS Foundation  
Columbus Building  
7 Westferry Circus  
Canary Wharf  
London E14 4HD  
United Kingdom

Dear Mr Faber

**COMMENTS ON PROPOSED AMENDMENTS TO THE INDUSTRY-BASED GUIDANCE ON IMPLEMENTING IFRS S2**

The Malaysian Institute of Accountants (“MIA”) is pleased to provide comments on the Proposed Amendments to the *Industry-based Guidance on Implementing IFRS S2* by the International Sustainability Standards Board (ISSB) as attached in Appendix 1 to this letter.

We hope our comments would be valuable to the ISSB’s onward deliberation.

If you have any queries or require clarification of this submission, please contact Rasmimi Ramli, Executive Director of Sustainability, Digital Economy, and Services at +603 2722 9277 or by email at [rasmimi@mia.org.my](mailto:rasmimi@mia.org.my).

Yours sincerely

**MALAYSIAN INSTITUTE OF ACCOUNTANTS**

**G SHANMUGAM**

Chief Executive Officer

**Question 1—Consequential amendments to the IFRS S2 industry-based guidance**

The ISSB proposes to make consequential amendments to the IFRS S2 industry-based guidance when it makes amendments to the SASB Standards in order to maintain alignment between the IFRS S2 industry-based guidance and the climate-related content in the SASB Standards.

Paragraphs BC11–BC14 of the Basis for Conclusions describe the reasons for this proposal.

**Do you agree that the ISSB should make consequential amendments to the IFRS S2 industry-based guidance when it makes amendments to the SASB Standards as set out in the SASB exposure draft? Why or why not?**

We agree with the proposal for the ISSB to make consequential amendments to the IFRS S2 industry-based guidance when it makes amendments to the SASB Standards.

We propose that the ISSB provides transition support such as mapping tools and illustrative examples to help preparers navigate changes, particularly for industries that will be affected by significant amendments.

**Question 2—Effective date**

The ISSB proposes to set an effective date for the consequential amendments that is the same as the effective date of the corresponding amendments to the SASB Standards. The ISSB proposes that the effective date be 12–18 months after the amendments are issued and to permit early application.

Paragraph BC15 of the Basis for Conclusions describes the reasons for this proposal.

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

We agree that the effective date for the consequential amendments similar to the effective date of the corresponding amendments to the SASB Standards, with an implementation window of 12–18 months and optional early application.

In determining the implementation window, we propose the ISSB to consider a phased implementation approach, starting with the most material categories and industries that are most affected by the metric revisions. In addition, jurisdictions may require more time on implementation assessment in their respective jurisdictions.