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Mr  
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## Methodology for Enhancing the International Applicability of the SASB Standards and SASB Standards Taxonomy Updates

Dear Mr Faber,

As organization of German listed and capital market-oriented companies, Deutsches Aktieninstitut welcomes the opportunity of commenting on the Exposure Draft ISSB/ED/2023/1 Methodology for Enhancing the International Applicability of the SASB Standards and SASB Standards Taxonomy Updates. German companies are in favor of enhancing the international applicability of the SASB standards in order to have an internationally applicable set of SASB standards in place at the beginning of 2024 when IFRS S1 and IFRS S2 can be applied by companies. It is crucial that the updated SASB standards will be issued before IFRS S1 will take effect.

We agree that the proposed methodology to amend the SASB Standards metrics would enhance the international applicability of the SASB Standards metrics. As it will be important for preparers of sustainability reports to be able to review the specific proposed amendments, we support the publication of the updated SASB standards for public fatal flaw review, scheduled for Autumn 2023.

We would welcome a clarification by the ISSB on how the updated SASB standards will interact with the IFRS S1, IFRS S2 and future ISSB standards. Overall, alignment or interoperability of the updated SASB standards with the European Sustainability Reporting Standards (ESRS) is of key importance.

We support that the revision approach 1 stipulated in the Exposure Draft should be the first course of action. We agree that any amendments to the content of the SASB standards require corresponding updates to the SASB Standards Taxonomy.

Our assessment on future SASB standards refinements depends on how the ISSB intends to integrate the updated SASB standards into IFRS S1, IFRS S2 and future ISSB standards. When updating SASB standards and for future SASB standards refinements we urge the ISSB to work on the alignment and interoperability with

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sector-specific ESRS. The alignment of sector-specific requirements is not only crucial for preparers, but also for users, as it enhances applicability and comparability of the information.

We kindly ask you to take our remarks in the revision process into consideration and remain at your disposal in case of questions.

Yours faithfully



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Jan Bremer  
Head of EU Liaison Office