

# Template for comments and secretariat observations

Date: 2022-03-09

ISO/DIS 32210

SIS-remiss 22487

MB/ NC <sup>1</sup>	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment <sup>2</sup>	Comments	Proposed change	Observations of the secretariat
TA				ge	<p>The principles and guidelines described in this draft international standard are well in line with the recommendations of those of the Task Force on Climate Related Financial. As such they provide valuable guidelines for organizations on how to align themselves with sustainability principles.</p> <p>We see a weakness in the draft proposal in terms of transparency and trust:</p> <ol style="list-style-type: none"> <li>1. The standard does not contain any measures on how aligned the organization is towards the sustainability goals.</li> <li>2. From a consumer/stakeholder perspective it is difficult to understand how to interpret the standard. What does it mean to a third party that an organization is certified according to this standard?</li> <li>3. What are the consequences for an organization who does not implement all parts of the standard?</li> </ol>	<p>The standard should include measures on how aligned the organisation is with its sustainability goals.</p> <p>The standard should include a section on how third parties should read and understand the ISO standard and what it means to them.</p> <p>It should be clear to a third party how the standard is supervised and what the consequences are if an organisation does not follow the principles and guidelines.</p>	
	455-457			ge	<p>The standard proposes to come up with measures on sustainability but those may not be comparable across firms.</p>	<ul style="list-style-type: none"> <li>• The standard should give explicit guidance on what qualitative and quantitative metrics could qualify for appropriate indicators (e.g., ESG indicators). The same applies for products and services.</li> <li>• Does the standard apply even for small financial firms without a complex organizational structure and abundant available capital for reporting?</li> </ul>	

1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by \*\*)

2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

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	467-473			ge	<ul style="list-style-type: none"> <li>As several large firms already disseminate sustainability reports, those could be good examples for other corporations, which might be brought up by the standard.</li> </ul>	<ul style="list-style-type: none"> <li>Similarly to applicable metrics, the standard should give explicit guidance on how to compile a report (e.g., structure, content) and how the measured indicators should be presented (e.g., group level or by subsidiaries) in order to attain comparability across organizations and industry.</li> </ul>	

Svar från: Tillväxtanalys

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