EMJ.LIFE | PRE-DISCLOSURE EVIDENCE INFRASTRUCTURE

RESPONSE TO ISSB

NATURE RELATED DISCLOSURES

October 2026 consultation
Targeted implementation recommendations



SUPPORT WITH TARGETED IMPLEMENTATION RECOMMENDATIONS

EMJ LIFE HOLDINGS PTE. LTD.

Singapore | 23 October 2026

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EMJ.RESP.ISSB-NATURE.2026

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23 October 2026

International Sustainability Standards Board
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By email commentletters@ifrs.org

Response to the ISSB nature related disclosures consultation

Exposure Draft ISSB/ED/2026/1
IFRS Sustainability Disclosure Practice Statement 1 Nature-related Disclosures

Dear Board Members,

EMJ LIFE HOLDINGS PTE. LTD. welcomes the opportunity to respond to the Exposure Draft. We support the proposed Practice Statement and its application with IFRS S1 and IFRS S2, with targeted implementation recommendations set out in the following pages.

We respond as a Singapore-based Institutional Evidence Systems Integrator developing Pre-Disclosure Evidence Infrastructure. Our comments concern the information supporting location-related judgements, scenario analysis and metrics, and how that information can be preserved and reused.

We recommend extending the existing examples to explain changes in source data and methods, incomplete assessment coverage, overlapping exposures and the reuse of information across reporting frameworks. Our recommendations preserve the proposed materiality and proportionality arrangements and focus on implementation guidance.

Our detailed responses identify the relevant questions and paragraphs. The response matrix and source register record the scope and basis of our comments. Please direct any correspondence regarding this response to anderson@emj.life.

Yours faithfully,

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For EMJ LIFE HOLDINGS PTE. LTD.
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Response Overview

Field	Information
Consultation	Exposure Draft ISSB/ED/2026/1 IFRS Sustainability Disclosure Practice Statement 1 Nature-related Disclosures
Recipient	International Sustainability Standards Board IFRS Foundation
Respondent	EMJ LIFE HOLDINGS PTE. LTD., Singapore
Perspective	Institutional Evidence Systems Integrator Pre-Disclosure Evidence Infrastructure
Overall position	Support with targeted implementation recommendations
Document control	EMJ.RESP.ISSB-NATURE.2026 | v1.0
Issue date and review cut-off	23 October 2026
Comment deadline	19 February 2027
Document status	Final formal consultation response
Contact	Anderson Yu | anderson@emj.life

Executive Summary

We support the proposed Practice Statement and its application with IFRS S1 and IFRS S2. Our recommendations concern how preparers explain the evidence behind location-related judgements, scenario analysis and metrics. They focus on implementation guidance and worked examples that preserve the proposed materiality and proportionality arrangements.

We recommend extending the existing examples to show how a preparer distinguishes changes in underlying conditions from changes in data or methods, identifies incomplete assessment coverage, and handles overlapping exposures. We also recommend an interoperability example that reuses source information while explaining differences in reporting purpose, boundaries and measurement.

We are not proposing a mandatory evidence register, a new reporting taxonomy, a particular technology or an additional assurance requirement. The suggested examples should help entities apply existing and proposed requirements. They should not turn internal preparation records into a separate public reporting return.

Summary of Positions

Questions	Position	Requested action
1 and 3	Support	Explain connected use with IFRS S1 and IFRS S2; retain flexibility in assessment methods.
4 and 5	Support with examples	Extend location examples to show source precision, changing datasets and incomplete coverage.
8	Support with examples	Separate scenario conditions, inputs and analytical conclusions; explain updates between planning cycles.
9(a) to 9(c)	Support with clarification	Illustrate metric populations, denominators, overlaps and the conditional use of TNFD metrics.
11(a) and 12	Support	Retain the Practice Statement approach and clear conditions for asserting compliance.
14	Targeted guidance	Demonstrate evidence reuse with explicit differences between frameworks.
15 and 16(b) to 16(d)	Targeted comments	Test proportionate examples and implementation costs; no general feasibility or assurance-cost conclusion.

1 Institutional Profile and Scope of Response

EMJ LIFE HOLDINGS PTE. LTD., operating as EMJ.LIFE, is a Singapore-based Institutional Evidence Systems Integrator developing Pre-Disclosure Evidence Infrastructure. Our contribution concerns the organisation and preservation of information before formal disclosure and its subsequent reuse in institutional analysis.

This response is a documentary review of the Exposure Draft, Basis for Conclusions, Accompanying Guidance and offline survey. The Snapshot and earlier explanatory materials provide background. References to the Practice Statement describe the proposal unless stated otherwise. Source documents and the review boundary are recorded in Appendices B and C.

We have not conducted a preparer field test, ecological measurement validation or assurance engagement. We do not offer empirical estimates of market-wide implementation costs. Appendix A identifies the questions and subquestions addressed, including those on which we offer no substantive response.

2 Detailed Technical Responses

2.1 Question 1 Overall approach

Q1(a) Agree. Q1(b) Yes, with implementation clarification. Q1(c) Yes, with an additional connected-information example.

References: Exposure Draft paragraphs 1 to 13 and B1 to B7; Basis for Conclusions BC23 to BC34 and BC131 to BC143 [1, 2].

We support an investor-focused approach applied with IFRS S1 and IFRS S2. An entity should be able to explain how a dependency or impact gives rise to a risk or opportunity affecting its prospects. Source information used for this explanation can also support other reporting, but the reporting conclusion depends on the relevant requirements and the entity's circumstances.

The architecture is sufficiently clear. A practical example could make its application easier by following one water-related exposure through nature and climate disclosures. The example should identify which information is shared, which additional information is needed and how a reader can follow the connection. It should avoid both repeated disclosure of the same information and an unexplained assumption that one disclosure satisfies every relevant requirement.

We suggest extending an existing location example rather than introducing another reporting schedule. The example could retain the source period, geographical scope and scenario assumptions as the information is reused. This would help explain whether the same exposure is being described from different perspectives or whether the entity has identified different risks.

2.2 Question 3 Use of the TNFD LEAP approach

Agree with noting the relevance of LEAP without requiring its use.

References: Exposure Draft paragraphs 11 to 12; Basis for Conclusions BC101 to BC103 [1, 2].

We support the proposed flexibility. BC102 already explains that LEAP is not wholly aligned with the terms and concepts of the proposal. Applying an assessment method can help generate information, but does not determine which information must be disclosed under IFRS S1 or establish compliance with the Practice Statement.

Implementation guidance could show how an entity uses an assessment output, evaluates it against the applicable reporting requirements and records any adjustment to scope or interpretation. A short example should identify the method version and the judgement connecting its output to the disclosure. It should also show that another reasonable assessment approach can be used.

This recommendation does not ask the ISSB to approve particular assessment products or prescribe how entities must assess nature. It asks for a clearer illustration of the relationship between assessment information and the resulting disclosure.

2.3 Question 4 Location related considerations

Q4(a), Q4(b) and Q4(c) Agree, with additional implementation examples.

References: Exposure Draft paragraphs 10(a), 17 to 18, 26(b), 31 to 32 and B26 to B42; Basis for Conclusions BC104 to BC120 [1, 2].

We support consideration of location throughout the value chain and the use of judgement in determining geographical scale and disaggregation. BC119 already explains why a fixed scale or universal site-by-site disclosure would be inappropriate. Our recommendation preserves that approach.

An implementation difficulty arises when information with different spatial precision is combined. A supplier's registered address may identify a legal entity without identifying the production site or the basin from which a relevant input originates. A regional risk dataset can inform a location assessment, but its geographical coverage does not make it a direct observation at every facility within the region.

Paragraph B35 already recognises varying data quality and specificity. We recommend illustrating how a preparer carries those limitations into the explanation of a material risk. In the supporting records, the entity could distinguish the asset or activity concerned, its relationship to the reporting entity, the area to which the source information applies, and the period and resolution of that information. These are useful preparation considerations, not proposed mandatory fields.

Suggested addition to the Accompanying Guidance

> *When information at different geographical scales is combined, the example could explain how the entity determines that the information is relevant to the assets or activities assessed, and how any material limitations in precision or coverage affect the resulting disclosure. A regional indication need not be presented as a site-specific observation.*

This wording is proposed for an illustrative example, not as an additional requirement in the Practice Statement. It should be read with the proposed reasonable and supportable information mechanism and existing materiality requirements.

Disclosure and preparation records

An entity may need detailed records to support a materiality or aggregation judgement while publishing information at a broader scale. Guidance should preserve that distinction. It should not imply that every source record, supplier address or coordinate must be published. Where an entity uses a disclosure exemption, the conditions in paragraphs 36 to 38 remain applicable; a general preference for confidentiality is not a substitute for those conditions.

The example should enable a reviewer to understand why the chosen scale communicates the exposure. The benefit would be a more consistent explanation of location-related conclusions without requiring an exhaustive inventory of all locations.

2.4 Question 5 Illustrative location examples

Agree that the examples support application. Recommend two focused extensions.

References: Accompanying Guidance IE6 to IE28, IE29 to IE56 and IE57 to IE76; Exposure Draft paragraphs B35 to B42 [1, 3].

Example 1 usefully distinguishes a critical facility from a group of similarly exposed facilities. Example 3 already shows incomplete supplier-location information, broader sourcing regions and qualitative scenario narratives. We therefore do not regard missing-data treatment or qualitative analysis as wholly absent from the package.

Extension A A changed map without a changed facility

Consider a hypothetical facility assessed using an external basin dataset. In the following year the provider changes a boundary or risk-classification method. The facility, sourcing pattern and underlying environmental conditions might be unchanged, but the classification shown by the tool changes.

The example should explain how the entity investigates whether the change reflects new information about earlier conditions, a change in measurement method, an error or a change in current conditions. It should show the implications for the current disclosure and, where applicable, comparative information. Simply overwriting the earlier classification would conceal the basis for the change.

IFRS S1 already addresses changes in estimates, metric definitions and material errors. The addition should illustrate those arrangements in this location-related setting, with the relevant conditions and exceptions, rather than introduce a separate rule for updated maps [5].

> *The example could identify the source release used in each period, explain the reason for the changed classification, and demonstrate how the entity determines the appropriate treatment under the existing comparative-information and error requirements. The illustration should not presume that every updated dataset requires restatement.*

Extension B Partial coverage of sourcing locations

Extend Example 3 to show how an entity explains the coverage of the location information underlying its assessment. The example should distinguish the population of relevant sourcing activities from the part supported by more detailed information. It should show the treatment of the remaining population and whether its uncertainty could affect the conclusion.

Unknown locations should not automatically be treated as having no exposure. Conversely, uncertainty about a location does not establish that the activity is exposed to a particular risk. The example should demonstrate a reasonable assessment, using available information and explaining material limitations.

Both extensions could use the same hypothetical entities as the current examples. They would help preparers and users follow an assessment over time without prescribing a data provider, coordinate system or mandatory public dataset.

2.5 Question 8 Nature related scenario analysis

Q8(a) to Q8(e) Agree, subject to the proposed proportionality mechanisms and with targeted guidance.

References: Exposure Draft paragraphs 20 to 24, 27 to 28 and B49 to B66; Basis for Conclusions BC161 to BC178; Accompanying Guidance IE57 to IE76 [1, 2, 3].

We support scenario analysis for the proposed resilience assessment and disclosure of whether and how it informs risk assessment and opportunity identification. Our support concerns the design of the proposal. It does not establish that a particular scenario model is scientifically valid or feasible for every preparer.

Paragraph 24 already addresses scenario sources, time horizons, assumptions, locations and the period in which analysis was performed. The guidance also allows different approaches and recognises that capabilities develop over time. We recommend making those existing arrangements more concrete in an example rather than adding a parallel reporting requirement.

Keep scenario conditions separate from conclusions

A worked example should distinguish the information describing the present position, the assumed future conditions, and the entity's analysis of how its business would respond. For example, a scenario involving deterioration in pollination services is a condition tested by the analysis; it is not evidence that the deterioration has already occurred or a forecast that it will occur.

The source of an input should remain distinguishable from an assumption introduced by management or a model. Where a tool generates an estimate, the example could identify the relevant method release, input period and important limitations. The usefulness of a reasonable estimate should not depend on whether the information was observed directly.

Show an update between analysis cycles

Paragraph B66 distinguishes the timing of scenario analysis from the annual resilience assessment. Extend Example 3 to show a later reporting date at which new sourcing information becomes available before the next full scenario exercise. Explain how the entity considers the new information and its implications for resilience without implying that a complete new model run is invariably necessary.

> *The example could explain which inputs remain appropriate, which assumptions have been reconsidered, and whether the new information changes the entity's assessment or its explanation of limitations. It should distinguish the date of the analysis, the reporting date of the assessment, and the future period considered.*

For Q8(d) and Q8(e), the example could also show when one scenario exercise supports resilience, risk assessment and opportunity identification. The entity should describe the different uses clearly and avoid counting repeated use of one analysis as independent corroborating evidence.

2.6 Question 9 Metrics

Q9(a) and Q9(b) Agree with targeted implementation guidance. Q9(c) Agree. No response to Q9(d) or Q9(e).

References: Exposure Draft paragraphs 30 to 33 and B41 to B42; Basis for Conclusions BC188 to BC205; Accompanying Guidance IE29 to IE56 [1, 2, 3].

We support the proposed information on assets or business activities vulnerable to nature-related risks and aligned with nature-related opportunities, with the proposed proportionality mechanism. Our comments concern interpretability and preparation. We do not recommend additional mandatory ecological metrics without evidence of common user needs and feasible measurement.

Population denominator and overlapping exposure

Example 2 could show more explicitly how the reported amount and percentage relate to a defined population and how overlapping risks are treated. An activity can be exposed to more than one risk. Separate breakdowns need not be additive; the reader should be able to understand that relationship.

Hypothetical illustration. An entity selects an appropriate asset measurement basis for an identified population of CU100 million. Assets of CU60 million are vulnerable to water-related risk and assets of CU20 million to another nature-related risk. CU10 million is included in both groups. On these assumptions, the unique amount exposed to either risk is CU70 million, not CU80 million. The two breakdowns remain informative if their overlap is explained.

This illustration does not prescribe carrying amount as the measurement basis for every entity, require a universal combined metric, or equate the exposure measure with an expected loss. It shows why a calculation basis and treatment of overlap matter when an entity presents such an aggregate.

Incomplete assessment coverage

A separate example could show an assessed population of CU80 million within a relevant population of CU100 million, with CU40 million identified as vulnerable and the remaining CU20 million not yet resolved. Forty divided by eighty describes the assessed subset. Forty divided by one hundred describes the identified amount relative to the whole population. Neither calculation establishes that the unresolved amount has no exposure. The entity would still need to determine the appropriate disclosure using all reasonable and supportable information.

Add a worked illustration of the population, measurement basis, denominator, assessment coverage and any overlap relevant to understanding a reported amount or percentage. Explain the effect of material uncertainty without automatically classifying unassessed activities as unexposed.

For Q9(c), we support permitting consideration of TNFD disclosure metrics subject to the proposed conditions. A familiar metric name should not obscure an adjusted definition or population. Guidance can illustrate how such differences are explained when the information is reused.

2.7 Question 11 Form of standard setting

Q11(a) Agree. No alternative form or effective date is proposed under Q11(b) or Q11(c).

References: Exposure Draft paragraphs 2 to 3 and IN6 to IN10; Basis for Conclusions BC35 to BC47 [1, 2].

We support the proposed Practice Statement approach at this stage. It gives preparers and jurisdictions a structured basis for nature-related disclosures while preserving the distinction between applying the Practice Statement and complying with IFRS Sustainability Disclosure Standards.

The implementation materials should consistently explain that IFRS S1 already encompasses material nature-related information. The separate status of the Practice Statement should not be presented as making all nature-related disclosure optional for an entity applying IFRS S1. Jurisdictional requirements also remain relevant.

A future decision on the form of standard-setting should draw on implementation experience and follow the applicable due process. We do not propose a predetermined conversion date. Relevant experience would include how preparers use the proportionality mechanisms, the quality of explanations of material limitations, and the costs of preparing and reviewing the information.

2.8 Question 12 Statement of compliance

Agree with the proposals in paragraphs 35 to 38.

References: Exposure Draft paragraphs 35 to 38; Basis for Conclusions BC218 to BC226 [1, 2].

We support an explicit and unreserved statement where the required conditions are met. BC222 and BC223 already address the difference between asserting compliance and starting to use some aspects of the Practice Statement. They also preserve materiality. The proposed exemptions have specified conditions; using an applicable exemption does not by itself prevent a statement of compliance.

A short example could help report users distinguish reference to selected guidance from an assertion of compliance. It could also show that omitting information judged immaterial under the applicable requirements is different from failing to meet a material requirement. This would reinforce the existing proposal rather than create a third category of partial compliance.

Any digital presentation should retain the reporting entity, reporting period and wording of the actual compliance statement. A reference to a framework, a completed mapping or a technical validation result should not be rendered as a compliance assertion that the entity has not made. This is a recommendation for faithful implementation; it does not ask the Practice Statement to mandate digital tagging.

2.9 Question 14 Interoperability

Recommend a worked example that reuses source information and explains the remaining differences.

References: Question 14 of the Invitation to Comment; Basis for Conclusions BC63 to BC65 and BC198 to BC203; Exposure Draft paragraphs 11 to 13 and 30(b) [1, 2].

We support the effort to reduce duplication for entities applying the proposed Practice Statement alongside ESRS or GRI Standards. The most useful next step would be a worked example showing both the information that can be reused and the judgements that still need to be made for each reporting purpose.

The example could begin with the same source records for a water-dependent activity. It could show how the reporting entity determines the relevance of that information to the requirements under consideration. Differences in the population, time horizon, measurement definition or reporting objective should remain visible. A broad assertion that two disclosures are equivalent would not explain these differences.

Suggested contents of the interoperability example

1. Identify the specific requirement and version being compared, together with the reporting purpose relevant to the example.
2. Identify the source information reused and the entity, activity, location and period to which it relates.
3. Explain any difference in the population, measurement basis, scope or materiality judgement.
4. Show the adjustment or additional information needed, including where only part of a disclosure can be reused.
5. State the limits of the example so that a mapping is not treated as a general finding of compliance or equivalence.

The recommendation is for official implementation material explaining the proposed requirements. We have not performed a clause-by-clause comparison with particular ESRS or GRI versions in this response. We therefore do not assert that a specific pair of requirements is equivalent or identify a verified wording conflict between those frameworks.

Suggested guidance wording

> *An example could demonstrate how information prepared for another reporting framework is used in applying the Practice Statement. It could identify the information retained, any adjustment necessary for the applicable reporting purpose, and any additional information needed. Reuse of source information does not by itself establish that the requirements of both frameworks have been met.*

The illustration should remain technology-neutral. An entity could use its existing documents, calculation files or information systems. A machine-readable mapping can make relationships easier to retrieve, but similarity between labels does not resolve differences in the underlying requirements.

Publishing the example with a clear version and explanation of substantive revisions would also help preparers identify whether a later change affects their earlier interpretation. This is a publication-control recommendation for guidance, not a new entity reporting obligation.

2.10 Question 15 Proportionality mechanisms

Retain the proposed mechanisms. No additional blanket relief is requested.

References: Exposure Draft paragraphs 33(a), B36 and B49 to B66; Basis for Conclusions BC48 to BC57 and BC194 [1, 2].

We recommend implementation examples for uneven value-chain data availability. They should show how an entity uses reasonable and supportable information without undue cost or effort, explains material limitations and reconsiders its approach as information and capabilities change. A lack of precise supplier coordinates should not automatically prevent a useful assessment.

The examples could distinguish information already available to the entity, reasonable estimates based on broader locations, and information that remains unresolved after applying the relevant mechanism. They should also explain why the selected approach is commensurate with the entity's circumstances where that mechanism applies. These distinctions would help users understand the basis of an assessment without requiring a public register of every unsuccessful data request.

We do not propose a general right to defer material information until data are complete. Nor do we propose a fixed maturity classification or an automatic exemption for smaller entities. The existing mechanisms require consideration of the particular circumstances and the information reasonably available.

2.11 Question 16 Implementation effects and costs

Targeted response to Q16(b), Q16(c) and Q16(d). No empirical conclusion under Q16(a).

References: Basis for Conclusions BC238 to BC264, particularly BC252 to BC258 [2].

For Q16(b), clearer explanations of sources, coverage and changes could improve interpretability. However, a documentary review cannot establish feasibility across industries and jurisdictions. We recommend testing the extended examples with preparers at different levels of reporting experience before drawing a general conclusion.

For Q16(c), relevant cost categories include establishing supplier-to-location relationships, obtaining usable data rights, reconciling overlapping populations, retaining earlier calculation inputs, and reviewing changes. Repeated requests for the same evidence can add cost where several reporting teams or frameworks use it. These are prospective implementation considerations, not measured costs or evidence that a particular system will reduce them.

For Q16(d), records that connect a disclosed amount or conclusion to its source and method could support an assurance practitioner's work. They do not establish evidence sufficiency or guarantee that assurance will be available at reasonable cost. We offer no market-wide assurance-cost conclusion. A preparer and assurance-practitioner pilot could examine reconstruction of calculations, access to third-party inputs and the effort needed to review changed assumptions.

3 Consolidated Recommendations

Priority	Action	Proposed location
1	Extend examples to explain spatial precision, assessment coverage and changes in source datasets.	Accompanying Guidance supporting Q4 and Q5
2	Show how scenario inputs, future conditions and conclusions remain distinguishable, including updates between cycles.	Example 3 and guidance supporting Q8
3	Illustrate denominators, overlaps and unresolved coverage in the proposed metrics.	Example 2 and guidance supporting Q9
4	Retain the compliance proposal and illustrate selected use of guidance without a partial-compliance assertion.	Implementation material supporting Q12
5	Publish a bounded interoperability example identifying reused information and remaining differences.	Implementation material supporting Q14
6	Test the examples for preparation and review effort with preparers and assurance practitioners.	Implementation support and effects assessment for Q15 and Q16

Our preferred action is to strengthen accompanying examples and implementation support. If testing shows that an example cannot resolve a substantive ambiguity, the ISSB can then consider whether a change to the proposed requirements is necessary. We do not recommend adding detailed recordkeeping provisions before that need is established.

4 Closing Remarks

We welcome the opportunity to comment. The proposed package provides a basis for more consistent nature-related disclosures. Our recommendations focus on helping a preparer explain what its information supports, how that information relates to its activities, and why a conclusion or amount changes over time.

The resulting guidance should preserve reasonable estimation and proportionality while helping users distinguish an underlying change in exposure from a change in data, scope or method. That distinction would make disclosures easier to interpret and review.

Appendix A Response Matrix

Question numbers follow the October 2026 Invitation to Comment. This matrix identifies the questions and subquestions addressed in our formal response.

Question	Scope and position	Letter section
1(a) to 1(c)	Agree or Yes, with a connected-information example.	2.1
2	No substantive response to the proposed definitions.	Not addressed
3	Agree with the optional use of LEAP.	2.2
4(a) to 4(c)	Agree, with targeted location guidance.	2.3
5	Agree; extend examples for updates and incomplete coverage.	2.4
6	No substantive response on stakeholder categories or rights.	Not addressed
7	No separate substantive response on strategy disclosures.	Not addressed
8(a) to 8(e)	Agree with proportionality and implementation examples.	2.5
9(a) to 9(c)	Agree, with comments on metrics and permitted sources.	2.6
9(d) and 9(e)	No proposal for additional mandatory cross-industry metrics.	Not addressed
10	No separate substantive response on targets.	Not addressed
11(a)	Agree with the proposed Practice Statement form.	2.7
11(b) and 11(c)	No alternative form or effective date proposed.	Not addressed
12	Agree with paragraphs 35 to 38.	2.8
13	No separate substantive response on transition.	Not addressed
14	Recommend an interoperability example.	2.9
15	Retain mechanisms; provide examples without blanket relief.	2.10
16(a)	No empirical benefits-versus-costs conclusion.	Not addressed
16(b) to 16(d)	Targeted comments; feasibility and assurance costs not established.	2.11
17	No additional response beyond the topics above.	Not addressed

Appendix B Scope and Review Record

Institutional independence

This independent response is issued by EMJ LIFE HOLDINGS PTE. LTD. It is not issued on behalf of the IFRS Foundation, ISSB, TNFD, EFRAG, GRI or any other referenced organisation. No endorsement, acceptance, adoption or transfer of institutional authority is claimed.

The letter states recommendations on proposed requirements and implementation material. It does not determine an entity's compliance, materiality, legal obligations or assurance conclusions. Responsibility for those decisions remains with the relevant entities, authorities and qualified professionals.

Review method

The review considered the October 2026 Exposure Draft, its Basis for Conclusions, Accompanying Guidance and offline survey. We cross-checked the principal question and paragraph references used in this letter. The April 2026 FAQ and the one-page proposed-way-forward document were treated as background, not as substitutes for the October consultation package.

The response was also checked against selected IFRS S1 provisions on metrics, measurement uncertainty and comparative information. Those references identify existing arrangements relevant to the proposed examples. We do not reproduce the Standard or claim a comprehensive review of its application in particular fact patterns.

The numerical illustrations in Section 2.6 and the situations proposed in Sections 2.3 to 2.5 are hypothetical EMJ.LIFE examples. They are not observations from a preparer field test and are not examples issued by the ISSB. Proposed guidance wording is identified separately from descriptions of the consultation materials.

Version record

Version	Date	Record
1.0	23 October 2026	Final formal consultation response. Issued by EMJ LIFE HOLDINGS PTE. LTD. for submission by email.

Document identity: EMJ.RESP.ISSB-NATURE.2026. Source documents retain their respective rights. Public distribution of this response does not grant rights in the referenced IFRS Foundation materials.

Appendix C Source Documents

[1] ISSB. Exposure Draft ISSB/ED/2026/1. IFRS Sustainability Disclosure Practice Statement 1 Nature-related Disclosures. October 2026. Invitation to Comment and proposed paragraphs cited in the relevant sections. Official source

[2] ISSB. Basis for Conclusions on the Exposure Draft. October 2026. Principal references include BC35 to BC65, BC101 to BC120, BC161 to BC205, BC218 to BC226 and BC238 to BC264. Official source

[3] ISSB. Accompanying Guidance on the Exposure Draft. October 2026. Examples 1 to 3, particularly IE6 to IE76, inform the comments on location, metrics and scenario analysis. Official source

[4] IFRS Foundation. Exposure Draft on Nature-related Disclosures survey offline copy. October 2026. Reference for the consultation question structure and wording. Official source

[5] IFRS Foundation. IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information. Issued June 2023; official 2026 HTML edition reviewed. Relevant cross-checks: paragraphs 49 to 53 and 77 to 85, and B50 to B59. Existing requirements are not presented as new recommendations. Official source

[6] IFRS Foundation. Snapshot of the Exposure Draft on Nature-related Disclosures. October 2026. Overview only; it does not replace the proposed requirements. Official source

[7] IFRS Foundation. Nature-related Disclosures Frequently Asked Questions on form of standard-setting. April 2026. Background material only; later consultation details take precedence. Official source

[8] IFRS Foundation. The proposed way forward for nature. One-page explanatory document. Background material describing the proposed approach before publication of the October draft. Official source

[9] IFRS Foundation. Exposure Draft and comment letters page for Nature-related Disclosures. Official consultation and submission information. Official source

Review cut-off: 23 October 2026. Paragraph prefixes follow their source documents: BC identifies the Basis for Conclusions; IE identifies the Accompanying Guidance; B identifies an appendix paragraph in the document named. Document descriptions are paraphrased. Proposed wording and hypothetical examples are EMJ.LIFE recommendations.