

CSSB Canadian Consultation on CSSB's Proposed 2025 – 2028 Strategic Plan

A public consultation issued by the Canadian Sustainability Standards Board

Comments from ACCA to CSSB

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About ACCA:

We are ACCA (the Association of Chartered Certified Accountants), a globally recognized professional accountancy body providing qualifications and advancing standards in accountancy worldwide.

Founded in 1904 to widen access to the accountancy profession, we've long championed inclusion and today proudly support a diverse community of over **252,500 members** and **526,000 future members** in 180 countries.

Our forward-looking qualifications, continuous learning and insights are respected and valued by employers in every sector. They equip individuals with the business and finance expertise and ethical judgment to create, protect, and report the sustainable value delivered by organizations and economies. Guided by our purpose and values, our vision is to develop the accountancy profession the world needs. Partnering with policymakers, standard setters, the donor community, educators and other accountancy bodies, we're strengthening and building a profession that drives a sustainable future for all.

Find out more at: www.accaglobal.com

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GENERAL COMMENTS

ACCA welcomes the opportunity to provide feedback on the Canadian Sustainability Standards Board's (CSSB) Proposed 2025–2028 Strategic Plan. We commend the CSSB for its comprehensive and forward-looking priorities, particularly its intent to ground Canada's sustainability disclosure regime within a globally consistent, yet distinctly Canadian, context.

Priority A – Establishing the CSSB as the source of Canadian reference standards for high-quality sustainability disclosure and Priority – C – Contributing to the development of international sustainability disclosure standards

ACCA strongly supports the CSSB's strategic priority to establish itself as the source of Canadian reference standards for high-quality sustainability disclosure in conjunction with Priority C – Contributing to the development of international sustainability standards.

ACCA continues to encourage alignment of the Canadian Sustainability Disclosure Standards (CSDSs) with internationally recognized frameworks – especially those developed by the International Sustainability Standards Board (ISSB). As a global body, ACCA advocates for reporting frameworks that enable comparability, consistency, and decision-useful information across jurisdictions.

When aligning CSDSs with the future standards issued by the ISSB, ACCA encourages applying the Criteria for Modification only where truly necessary to reflect Canadian-specific considerations, employing a building blocks approach such that the ISSB's standards are the baseline.

ACCA believes that the CSSB proactively engaging with international and regional standard setters will support global interoperability, especially in areas such as biodiversity, climate adaptation, and human capital. By engaging in the creation of international sustainability standards, the CSSB will be better able to adopt the international standards as written with minimal modifications.

We support a globally aligned Canadian disclosure regime that enables capital markets to compare sustainability performance seamlessly across borders, without imposing unnecessary burdens on preparers.

Priority B – Advancing the inclusion of Indigenous peoples in sustainability standard setting

ACCA supports the CSSB's commitment to incorporating Indigenous Peoples' perspectives into its strategic priorities. We advocate for inclusive and transparent sustainability standards.

Specific guidance and reference materials on materiality and Indigenous matters will allow preparers to better comply with sustainability reporting disclosures, though the CSSB must ensure that the guidance does not introduce new standards or ways of reporting.

ACCA supports further work to develop culturally appropriate engagement mechanisms and, where feasible, guidance that reflects Indigenous priorities, particularly in disclosures related to land, biodiversity, and social impact.

Priority D – Determining where the CSSB may contribute by developing additional sustainability standards and/or guidance

ACCA welcomes the CSSB's recognition of the need to consider sector- and entity-specific guidance, particularly for small and medium-sized enterprises (SMEs) and public sector entities.

ACCA recommends that the CSSB assess where simplified disclosures or phased implementation may support SMEs without compromising the quality or utility of information. However, while ACCA thinks that guidance such as sector specific examples and scenarios would be useful, care is needed to ensure that such guidance does not introduce additional disclosure requirements that might inadvertently conflict with or obscure information required by the IFRS Sustainability Disclosure Standards.

Further, additional or new guidance for the public sector should look to the International Public Sector Accounting Standards Board (IPSASB) Sustainability Reporting Standards, which are currently being developed. This will improve global interoperability allowing for better comparisons across countries.

Conclusion

ACCA endorses the CSSB's strategic direction and believe the priorities outlined – if executed with a strong commitment to international alignment and practical implementation – will support the development of high-quality, decision-useful sustainability disclosures in Canada.

ACCA remains committed to collaborating with the CSSB and stakeholders across Canada to ensure that sustainability disclosure supports informed decision-making and a just, sustainable economy.