



ADIC SUBMISSION

IFSR Foundation

*Exposure draft:
Proposed amendments
to the SASB Standards*

July 2026

About us

This submission is informed by the perspectives of the dairy industry's peak and service bodies.

Australian dairy industry Council (ADIC)

The ADIC is the peak national body of the Australian dairy industry, representing the interests of dairy farmers and dairy processors through its two constituent bodies, Australian Dairy Farmers (ADF) and the Australian Dairy Products Federation (ADPF). It aims to create a more prosperous and sustainable future for the local industry and the regional communities that rely on it.

Australian Dairy Farmers

ADF is the national peak industry representative body for dairy farmers across Australia's six dairy-producing states. Its membership includes the State Dairy Farming Organisations from each state, as well as direct farmer members.

Australian Dairy Products Federation

ADPF is the national peak policy and advocacy body representing the post-farmgate members of the Australian dairy supply chain, including processors, traders and marketers. ADPF members process more than 90 per cent of Australian milk volumes and supply dairy products to domestic and export markets.

Dairy Australia

Dairy Australia is the national services body and research and development corporation (RDC) for the dairy industry. It is the industry's investment arm, funding research, development and extension that cannot be undertaken efficiently by individual farmers or companies and helping farmers adapt to a changing operating environment to achieve a profitable, sustainable industry

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Acknowledgement of Country

Australian Dairy Industry Council acknowledges the Traditional Owners of Country throughout Australia. We pay our respects to Elders past and present.

International Sustainability Standards Board
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Submitted electronically via www.ifrs.org

Dear ISSB Members,

Re: Exposure Draft: Proposed Amendments to the SASB Standards and consequential amendments to the IFRS S2 Industry-based Guidance (Meat, Poultry & Dairy)

The Australian Dairy Industry Council (ADIC) welcomes the opportunity to comment on the Exposure Draft. The ADIC is the peak national representative body for the Australian dairy industry. Through its two constituent organisations, Australian Dairy Farmers (ADF) and the Australian Dairy Products Federation (ADPF), it represents the interests of dairy farmers and dairy manufacturers. This submission is made jointly with Dairy Australia, the national services body for dairy farmers and the industry.

This submission reflects the perspective of the whole dairy supply chain, from dairy farm to factory. We understand that multiple SASB Standards may be applied by dairy businesses working across this value chain and have made reference to those where appropriate. Our comments focus on the proposed amendments to the Meat, Poultry & Dairy SASB Standard (Question 2), with detailed responses to the consultation questions at Appendix A and metric-level comments at Appendix B.

The Australian dairy industry

Australian dairy is one of the country's largest agricultural industries. Around 3,772 predominantly family owned and operated farm businesses produce approximately 8,315 million litres of milk annually, generating \$5.97 billion in payments to dairy farmers in 2025 and directly employing around 30,400 people, largely in regional communities. Milk is manufactured into dairy products by a manufacturing sector that ranges from farmer cooperatives to single-plant and multinational organisations, with 36 per cent of Australian milk production exported, valued at \$3.8 billion.

Critically for this consultation, the dominant structure of the industry is not vertical integration – dairy manufacturers source milk from large numbers of independent farm businesses and most do not own, operate or control on-farm activity. Any reporting standard applied to the dairy value chain must work within that structure.

The Australian Dairy Sustainability Framework

The Australian dairy industry has extensive experience in industry-level reporting on sustainability. Since 2012, the industry has set, measured and publicly reported on sustainability commitments through the Australian Dairy Sustainability Framework (ADSF), a whole-of-industry framework built around the industry's promise to provide nutritious food for a healthier world. The ADSF comprises four commitments and twelve goals spanning economic viability and livelihoods, wellbeing of people, animal health, welfare and biosecurity, and environmental impact, with progress published annually in a public scorecard.

The Framework continues to evolve - a 2024 double materiality assessment identified the sustainability topics most significant to the industry and its stakeholders, the animal care commitment was refreshed in 2025 with a new dedicated biosecurity goal, and working groups are reviewing goals, targets and data

sources across the remaining commitments, including emerging priorities such as climate risk and resilience. This submission draws directly on that experience, as the industry understands, in practice, what it takes to define, collect and report credible sustainability data across thousands of farms and dozens of manufacturing sites.

The references to the Australian Dairy Sustainability Framework in this submission are included to illustrate the Australian dairy industry's practical experience with reporting on sustainability and should not be interpreted as endorsing any future revisions to the Framework, its goals or targets, which remain subject to separate governance and industry consultation processes.

Overall position

The Australian dairy industry supports transparent, credible sustainability reporting; the ADSF is evidence of that commitment. Our position on the proposed amendments in this Exposure Draft is guided by the following:

- We support globally consistent sustainability reporting that improves comparability, reduces duplication and provides decision-useful information for investors.
- We acknowledge the role of the IFRS Foundation and the ISSB as the global standard-setters responsible for the SASB Standards. Our comments are directed at the workability and design of the global standard.
- Further discussions amongst industry and domestic regulators and standard setters in Australia is essential when considering the SASB Standards and any possible changes to Australia's current sustainability reporting regime. Specifically, we do not support expanding industry-specific reporting requirements where they duplicate existing obligations, impose disproportionate implementation costs, or require dairy farmers or manufacturers to report information outside of their reasonable control or ability to verify. Any new disclosure requirements should demonstrate a clear investor need, deliver a net reporting benefit, align with existing reporting frameworks, and recognise established Australian regulatory, assurance and certification systems.

Beyond these principles, ADIC acknowledges that the SASB Standards are focused on investor audiences. While we agree that providing decision-useful information to investors is important, we also focus on agreed metrics which may drive on-farm management decisions or serve the purposes of broader stakeholders. We are concerned that significant efforts to collect data, which might not be readily available, and the likely costs associated with a potential compliance regime may both distract resources from on-farm improvement and the priorities of the ADSF and not have a clear benefit to investors.

Measured against this position, our detailed review of the Exposure Draft identifies five key concerns with the proposed amendments. These are summarised below and discussed in detail against each metric in Appendices A and B.

We welcome the opportunity to work with the ISSB, before the amendments are finalised, to ensure the standard delivers clear, practical and impactful reporting of sustainability metrics that investors can rely on and preparers across the dairy supply chain can realistically produce. Given the ISSB's interest in engaging global industry interests on these issues, ADIC would welcome the opportunity to help lead this engagement on behalf of the dairy sector, whether directly or in partnership with the Global Dairy Sustainability Framework (DSF).

Our detailed comments are guided by five principles:

1. **Disclosures must be decision-useful for investors and cost-effective for preparers.** These are the ISSB's own objectives, and each proposed metric should demonstrably satisfy both. Reporting obligations imposed on dairy manufacturers, by regulators, investors or customers, are likely to flow through the supply chain, placing additional pressure on Australia's dairy farms, many of which remain family owned. The industry can only continue investing in sustainability outcomes if dairy businesses remain commercially viable, enabling ongoing investment across the supply chain. Consistent with the ISSB's principles of proportionality and the use of reasonable and supportable information, reporting requirements should be capable of being met using information that entities can obtain without undue cost or effort. Where a metric cannot be supported by reasonable and supportable information, or where its decision-usefulness for investors is not clearly demonstrated, it should be revised, made proportionate to the reporting entity's circumstances, or removed.
2. **Reporting must reflect how dairy supply chains operate.** We note that this Standard applies to businesses producing raw and processed animal products, including dairy, and sits alongside the related SASB Processed Food Standard, which covers packaged foods for retail consumer consumption and shares some metrics. Individual dairy manufacturers apply the two Standards differently depending on their business model; our comments below relate to this Standard as it applies to dairy. Australian dairy manufacturers source milk from thousands of independent farm businesses. Farm businesses, most of them family-owned, do not have the capability to support corporate-style data systems and dairy manufacturers do not have access to or control over farm-based data. Proposed metrics should be tested against both realities, with risk-based application and phased, data-availability-based implementation pathways where full traceability remains a challenge.
3. **Metrics should be science-based and outcome-focused, not process-driven.** Any new metrics should measure outcomes grounded in evidence, particularly for emissions, animal health and welfare, and environmental management, rather than activity or process. Descriptive content in the Standard should also be scientifically accurate and appropriately contextualised, including the framing of livestock emissions.
4. **The Standard should be interoperable and should not duplicate existing systems.** Disclosures should align with other global standards and instruments, such as the EU's Corporate Sustainability Reporting Directive, the Global Reporting Initiative (GRI) Standards, and those with global reach such as the EU Deforestation Regulation. Any future consideration of formal adoption in Australia should also recognise existing domestic regulatory and assurance settings, including mandatory climate reporting under AASB S2, modern slavery reporting under the Modern Slavery Act, gender and equality reporting, employment and work health and safety law, the ASTAG antimicrobial classification, established food safety and biosecurity systems, and industry assurance programs under the ADSF. Where these systems exist, additional reporting should be required only where it demonstrably improves outcomes, and technical protocols should permit reference to equivalent national frameworks. We recognise that some points of alignment with Australian systems may ultimately be settled through the AASB's adoption and implementation of the Standard domestically, and we raise them here so they can be considered at source.
5. **Disclosures should be proportionate and framed so they cannot be misused.** We strongly support the proportionality mechanisms contemplated in paragraphs BC47 and BC48 of the Exposure Draft, particularly for metrics that reach through dairy manufacturers to farm-level businesses. Industry experience is also that investor-focused disclosures easily migrate into retailer procurement mandates and market access conditions, even in the absence of domestic regulation. We note that several metrics in this Standard are shared with the SASB Process Food

Standards and for Food Retailers & Distributors, which, while helpful for consistency, also creates a "pull-through" effect along the value chain that the ISSB should be conscious of when calibrating disclosure expectations. Metrics presented without adequate context, such as the proposed confined animal feeding operation disclosures, are particularly exposed to this risk and should carry definitions and contextual guidance sufficient to prevent well-managed farming systems being mischaracterised as unsustainable based on a lack of understanding of operating context. This metric is a useful illustration of the broader challenge of ensuring the Standard, originally developed with reference to US operating conditions, sufficiently reflects different operating contexts as it is extended through the ISSB's global baselining process, including Australian dairy farming systems.

Key themes from our detailed assessment

Our metric-level assessment of the proposed amendments is set out in the Appendices. Five cross-cutting themes emerge from that assessment and recur throughout Appendices A and B:

- a. **Unclear boundaries and definitions.** The proposed technical protocols rely on overlapping but inconsistently defined boundary terms, including operations, direct operations, direct farming operations and direct livestock operations, which appear to carry different meanings across the water, land use and deforestation metrics. The Land Use & Ecological Impacts topic states that its metrics are intended to capture direct livestock operations, yet the footprint metrics refer to any property the entity leases, manages or owns, leaving a dairy manufacturer that runs no farms unable to determine whether the topic applies to it at all. Other key terms are similarly unclear: the expanded definition of water consumption; the original reference state against which land disturbance is measured; the destination categories for water discharge, which do not accommodate effluent dispersed to land; the definition of confined animal feeding operations; and environmentally sensitive locations defined by international datasets that do not map to Australian frameworks. Consistent, clearly scoped definitions are a precondition for comparable, decision-useful disclosure, and the specific clarifications needed are identified against each metric in Appendix B.
- b. **The Standard, as drafted, does not fit dairy.** Several supply chain metrics are framed around sourced livestock, animal feed and animal protein measured by live weight, units and concepts that may be more readily applied to livestock production than to dairy value chains, where milk is the primary output and where farm businesses can have different production, purchasing and reporting arrangements. The deforestation metrics are linked to sourced livestock and feed, but it is unclear how these should be applied where dairy farms purchase a broader range of agricultural inputs or where exposure to deforestation risk occurs elsewhere in the dairy value chain. Existing metrics in other sector standards, such as metrics covering sourced agricultural commodities more generally and commodities determined to be deforestation- or conversion-free, may provide useful precedents for addressing these circumstances.
- c. **Traceability, influence and cumulative burden across the supply chain.** Extending environmental reporting across the supply chain is consistent with IFRS S2, and dairy manufacturers already estimate and report significant upstream impacts through Scope 3 greenhouse gas emissions. However, the feasibility of reporting varies considerably depending on the type of information required. Scope 3 emissions can be estimated using recognised methodologies, emissions factors, and accepted accounting approaches, whereas deforestation and land conversion disclosures require verified information about the actual origin of products and on-farm practices. Dairy manufacturers have direct relationships with their milk suppliers but cannot trace every on-farm input or direct farmers' decisions; feed, for example, is purchased independently by farmers based on animal health, nutrition, seasonal availability and

cost, and purchased dairy ingredients sourced through other dairy processors, traders or importers are opaquer still. The extent of traceability, visibility and influence can vary considerably across regions, industry structures and business models, including between co-operative, privately owned and vertically integrated supply chains. Reporting expectations should recognise these differing levels of traceability, influence and visibility, and should account for the cumulative burden on primary producers, who may be asked for similar information by multiple dairy manufacturers, customers, assurance programs and regulators. Given these variations, further engagement with the Global DSF and relevant regional dairy industry bodies, including ADIC, would help ensure that reporting requirements are both practical and reflective of different dairy production systems and supply chain structures globally.

- d. **Practical workability and data availability.** A number of metrics assume data, systems and supply chain control that do not currently exist in dairy. Examples include determining the deforestation status of animal feed purchased through intermediaries by dairy farms rather than by the manufacturer; real-time tracking of antibiotic use at farm level; measuring water consumed by humans and livestock or by non-irrigated crops; reporting discharge by destination and treatment level where trade waste is further treated by a utility; and publicly disclosing forward-looking risk to the retention of discharge permits. Relatedly, the proposed effective date of 12 to 18 months after issuance is unlikely to be sufficient for the new systems, supplier engagement and assurance the amendments would require across supply chains of thousands of farms. This process would require a longer, phased transition.
- e. **Areas of greatest concern.** Our strongest concerns relate to three proposals:
1. hours worked activity metric (FB-MP-000.D), which is neither meaningful nor practicable for family dairy farm businesses;
 2. confined animal feeding operation disclosures (FB-MP-160a.4 and FB-MP-430b.4), which risk characterising well-managed barn systems as unsustainable without context and are exposed to misuse in procurement and market access settings;
 3. deforestation-free sourcing metric (FB-MP-430b.1), which is among the most challenging in the revised standard and must be consistent with, not additional to, the EUDR.

We would welcome supplementary ISSB/SASB implementation guidance or a practice note explaining the relationship between the proposed deforestation disclosure requirements and existing regulatory frameworks such as the EUDR, including how reporters can leverage compliance activities and evidence developed for those frameworks to meet investor information needs without creating duplicative reporting obligations.

On the hours worked metric, we recognise that investors have a legitimate interest in understanding the proportion of the workforce that is casual or contract; our concern is one of practicability, since many dairy farms are family-owned businesses where family members do not always record their time, and if they live on the property there can be a blurred line on when work starts and stops. We welcome further ISSB guidance on the data being sought as an activity metric and other alternative approaches.

On the confined animal feeding operation disclosures, further guidance on what is meant by "context" would assist: for example, confined feeding can be a temporary response to drought or an animal welfare measure rather than a permanent system, and we invite the ISSB to develop guidance on how different confinement systems, including temporary confinement, should be treated and disclosed.

Appendix A responds to consultation questions 2(a) to 2(g) and Question 6 on the effective date. Appendix B provides metric-level comments on the specific proposed amendments to the Meat, Poultry & Dairy Standard.

We recognise that the GRI Standards are designed to capture impacts and drive improvement, while the SASB Standards serve a different, complementary purpose: helping companies disclose sustainability-related risks and opportunities most likely to affect cash flows, access to finance or cost of capital.

Our comments are directed at ensuring the SASB Standards fulfil that decision-useful, cost-effective disclosure purpose for investors in the dairy sector.

We would be pleased to discuss any aspect of this submission and to assist the ISSB in testing the practical application and feasibility of any proposed metric within Australian dairy supply chains.

We consider continued engagement between the ISSB, domestic regulators, Australian standard setters and industry to be essential before adopting the SASB Standards or implementing any changes to Australia's current sustainability reporting regime. This will help ensure the resulting reporting requirements are practical, proportionate and capable of being implemented across Australian industries.

Appendix A: Responses to consultation questions, Question 2 (Meat, Poultry & Dairy SASB Standard)

Responses below address consultation questions 2(a) to 2(g) of the Exposure Draft. Items marked in red italics remain subject to consultation with dairy processors or further industry engagement and are to be finalised or removed before lodgement.

Consultation question	Response
Q2(a) <i>Do you agree with the proposed Meat, Poultry & Dairy industry description? Does it accurately describe the business activities of entities in this industry? Do you agree with the scope of activities included in the industry classification? Why or why not?</i>	We broadly agree with and support the proposed Meat, Poultry & Dairy industry description. It appropriately captures the range of business activities undertaken by entities across this sector, including the production, processing and distribution of animal-derived protein products, and the updated language on vertical integration and contract farming arrangements is a practical improvement. We encourage the ISSB to ensure the final description, and the technical protocols that rely on it, remain workable for the mixed structures common in the Australian dairy sector, where dairy manufacturers source milk from large numbers of independent family farm businesses rather than operating vertically integrated supply chains, a structure shared with major dairy-exporting countries such as New Zealand and much of the European Union. More fundamentally, several metrics that flow from this description are built on livestock-based reporting units (sourced livestock, animal protein, live weight) that do not translate to a business that purchases milk and manufactures dairy products such as powders, cream and whey. We recommend the final Standard provide dairy-specific guidance, or reporting units that explicitly recognise milk and dairy products, so that entities are not left to translate an animal-based framework into a milk-based business on an ad hoc basis.
Q2(b) <i>Do you agree that the proposed disclosure topics would accurately identify the sustainability-related risks and opportunities that could reasonably be expected to affect the prospects of entities in this industry? If not, what revisions would you suggest and why?</i>	We broadly agree that the proposed disclosure topics reflect the material sustainability-related risks and opportunities for the industry. The revised and new topics, including Environmental Supply Chain Management, Social Supply Chain Management, Animal Health & Welfare and Product Innovation, are a meaningful improvement over the prior standard. We have the following specific observations. Greenhouse Gas Emissions (topic summary). We are concerned by the revised framing of livestock emissions as a significant portion of global greenhouse gas emissions. Livestock emissions represent approximately 12 per cent of global emissions, and presenting them as a significant global contributor without qualification is not scientifically accurate contextualisation and risks creating a misleading and potentially damaging impression of entities in this industry. We recommend the wording be revised so that the scale of emissions is contextualised accurately, consistent with a science-based approach to the standard's descriptive content. Workforce composition activity metrics. We do not support the addition of FB-MP-000.D (total hours worked disaggregated by employees and non-employee workers). Hours worked is not an appropriate or meaningful measure in on-farm contexts. On family dairy farms there is no clear boundary between owner time, family labour, lifestyle and business activity, so reported hours would not be comparable or decision-useful. Industry working groups also identified a risk that formalising hours-based reporting could pressure farmers, or discourage employees, from working the hours they choose to work. Consistent with an outcome-focused approach, we recommend the ISSB instead rely on outcome-based workforce measures, such as whether workers are appropriately compensated for hours worked, satisfaction with working arrangements, and health and safety outcomes, which are more meaningful and practicable for this sector. As an alternative that may better serve investors' interest in workforce composition, we suggest the ISSB consider a simpler activity metric reporting the number of employees and the proportion of the workforce that is

Consultation question	Response
	casual or contract, which would avoid the practical difficulties of hours-based reporting while still providing greater clarity on workforce structure and labour required for output. Land Use & Ecological Impacts: confined animal feeding operation (CAFO) metrics. We flag significant concern regarding FB-MP-160a.4 (percentage of animal protein production from confined animal feeding operations) and the parallel supply chain metric FB-MP-430b.4. While we acknowledge the transparency objective, disclosure of the percentage of production from barn or confined systems is likely to be misleading without adequate context about the sustainability benefits such systems can deliver, including biosecurity, resource efficiency and, in some barn environments, animal welfare benefits. Uncontextualized disclosure of this kind is also exposed to being repurposed in retail procurement or market access settings in ways that disadvantage well-managed farming systems without any demonstrated sustainability benefit. We recommend the ISSB clarify how confined animal feeding operations are defined and provide guidance on how entities should contextualise this disclosure.
Q2(c) <i>Do you agree that the proposed metrics and technical protocols would help an entity provide primary users with decision-useful information about sustainability-related risks and opportunities? If not, what revisions would you suggest and why?</i>	We agree in principle that the proposed metrics and protocols are an improvement on the existing standard and, where aligned with existing frameworks, should provide more decision-useful information. Our concerns relate to feasibility, technical clarity and the proportionality of compliance cost to information benefit, consistent with our view that reporting requirements should not impose costs on dairy farm businesses without delivering demonstrably decision-useful outcomes. Energy Management (FB-MP-130a.1). The proposed technical protocol calculates energy consumption using lower heating values by default, with a carve-out permitting different heating values where required by a jurisdictional authority or exchange. We seek confirmation that this carve-out accommodates the heating values used under Australian regulatory reporting, so preparers are not required to maintain parallel conversions, and recommend transition guidance given the effect on comparability with prior periods. The requirement to report purchased and renewable electricity disaggregated by source appears workable but should be tested for practical feasibility. We also note the amended protocol requires biomass-sourced renewable energy to be certified to a third-party standard while no longer naming any acceptable standards; we seek clarity on the treatment of genuinely renewable energy that is self-generated and self-consumed on site, for example biogas generated from effluent, including whether schemes such as GreenPower Renewable Gas Certification or the Commonwealth Guarantee of Origin scheme would qualify. More generally, this is an example of a global standard intersecting with domestic reporting settings; we suggest that, where a jurisdiction has an equivalent domestic standard or scheme in place, any Australian adoption of the Standard should include a relief permitting reference to that domestic standard in place of a parallel global calculation, to avoid duplication. In particular, we seek clarification on whether biogas produced and self-consumed on site from effluent or other biomass-derived feedstocks would remain eligible where the feedstock itself is not subject to third-party certification. Water Management (FB-MP-140a.1). We support the expanded disclosure of water withdrawal by source. However, the proposed definition of water consumption, particularly as it extends to water used in the production of crops and water consumed by humans and livestock, appears impractical and potentially infeasible for reporting entities outside irrigated systems. We recommend the ISSB clarify the definition of direct operations for this metric and engage with preparers on the technical feasibility of reporting human and livestock water consumption. Water Management (FB-MP-140a.2). The expanded risk assessment requirements are significant. Reporting on water-related risks spanning drought, floods, seasonal variability, water quality, price volatility, regulatory compliance, stakeholder perceptions and competition for water represents a substantial reporting burden whose cost should be weighed against its decision-usefulness. We

Consultation question	Response
	recommend the ISSB provide proportionality guidance and clarify whether the assessment is limited to direct operations or extends into the supply chain. Water discharge (FB-MP-140a.4). The new metric requiring disclosure of total water discharged by destination and treatment level should be tested with preparers, as it is not clear this data is readily available across the sector. Two points need clarification: how effluent dispersed to land should be categorised, given none of the listed destinations covers land application; and, for trade waste that is pre-treated on site and then further treated by a utility, whether the entity reports its own treatment level or the full treatment chain. Antibiotic use (FB-MP-260a.1). We support greater transparency on antimicrobial stewardship on a science-based footing, but note two practical concerns: real-time tracking of antibiotic use at farm level may not be feasible within current systems, and the definition of medically important antibiotics should permit reference to equivalent national classification systems. In Australia this is the Australian Strategic and Technical Advisory Group (ASTAG) classification, which underpins domestic regulation and practice. We recommend the ISSB clarify which classification system governs the metric and explicitly allow reference to recognised national frameworks. Food safety (FB-MP-250a.5 and FB-MP-250a.6). We question the decision-usefulness of FB-MP-250a.5 (percentage of production certified to internationally recognised food safety standards) seek clarity on which standards qualify and what investor benefit the metric delivers, noting that Australian dairy already operates under mature, audited food safety systems. We recognise that, as a global standard, this metric cannot assume every jurisdiction has mature food safety systems, and that its investor value lies in managing reputational and regulatory risk around potential food safety failures or recalls. We suggest the ISSB provide additional flexibility for preparers to demonstrate use of locally accredited food safety systems consistent with the Global Food Safety Initiative (GFSI), rather than requiring certification to a specific named international standard. For FB-MP-250a.6, the scope of the qualitative value chain disclosure appears potentially very broad. We recommend the ISSB clarify the level of detail expected and confirm that reference to an existing audited food safety plan would satisfy the requirement, so that the metric leverages rather than duplicates established systems.
Q2(d) <i>Do you agree that the proposed metrics in the Environmental Supply Chain Management and Social Supply Chain Management disclosure topics would support cost-effective disclosure of information that primary users need about sustainability-related risks and opportunities in the supply chain? If not, what revisions would you suggest and why?</i>	We have concerns about the feasibility, cost-effectiveness and proportionality of several metrics in the new supply chain topics, particularly as they would apply through dairy manufacturers to the dairy family farm businesses that make up the Australian dairy supply base. Deforestation-free sourcing (FB-MP-430b.1). This is one of the most challenging metrics in the revised standard. Tracing the deforestation status of animal feed across a complex supply chain, including soy or grain sourced through intermediaries and purchased independently by farmers rather than by the processor, will be extremely difficult. Traceability is harder still for purchased dairy ingredients such as milk powders, butter, cream and whey, which are sourced through other processors, traders or importers rather than directly from farms, so the processor may know its immediate supplier but have limited visibility of the farms, feed sources and production systems further back. The metric also appears to have been drafted primarily with a meat supply chain in mind. The term sourced livestock should be clarified for the dairy context, where the animal is retained in production rather than traded as a commodity. We further note that the metric, as drafted, does not appear to capture other deforestation-risk ingredients that processors purchase (palm-derived ingredients, cocoa, coffee, sugar, fruit and inclusions), which for value-added products may be the largest exposure and are recognised in the Agricultural Products Standard; the ISSB should clarify whether and where these are to be disclosed. We support consistency with the EU Deforestation Regulation (EUDR) where applicable but note that EUDR

Consultation question	Response
	implementation has been delayed because of feasibility concerns in agricultural supply chains; the SASB requirement should be consistent with that framework and must not create additional or conflicting obligations. As noted above, a comparable ingredient-level metric already exists in the Processed Food Standard (FB-PF-430b.1); we encourage the ISSB to ensure the two Standards are aligned on this point rather than developing divergent requirements for entities that report against both. Given the practical difficulty of tracing deforestation status through intermediaries, and noting that some Australian companies do report on the proportion of feed sourced domestically, we suggest the ISSB also consider the percentage of feed sourced locally or domestically as an additional, more readily verifiable metric and option which is meaningful to deforestation. Confined animal feeding operations in the supply chain (FB-MP-430b.4). As noted under Q2(b), we have significant concerns about the framing of this metric. Disclosure of the percentage of animal protein sourced from confined systems, defined as animal feeding practices in densely populated or limited spaces requiring chemical inputs, risks characterising barn-housed systems negatively without acknowledging their sustainability benefits in particular contexts. We recommend the ISSB consider excluding or differentiating well-managed barn systems, or at minimum provide guidance requiring the disclosure to be contextualised. Labour conditions and human rights (FB-MP-430c.1). The Australian dairy sector's 2024 materiality assessment as part of the review of the ADSF, identified responsible supply chain management, which encompasses human rights and modern slavery considerations, as a material topic. Worker health, safety and wellbeing are also material issues and form an important component of broader human rights outcomes. We do not suggest these risks are absent; in particular, the use of contractors and workers on visas presents some residual risk notwithstanding existing legal settings. While specific human rights risks within supply chains were not identified as standalone material topics in the assessment, Australia has comprehensive frameworks including Modern Slavery legislation, employment law, work health and safety law and industrial relations law, and the industry maintains a national human rights position. Additional reporting should therefore be required only where it demonstrably improves outcomes or can be made interoperable with domestic requirements. We consider this metric disproportionate for smaller farm businesses and recommend both a proportionality mechanism for entities below a relevant revenue or scale threshold, consistent with the Modern Slavery Act threshold approach, and further ISSB guidance on the nature and extent of human rights due diligence disclosures expected from smaller agricultural businesses. Animal feed certification and traceability (FB-MP-430c.2). Australian feed standards are not nationally harmonised and remain state-based. The SAFEMEAT draft Australian feed standard for food-producing animals, released in 2025, has not been finalised or incorporated into state legislation, and it focuses on food safety of the final product rather than environmental or social sourcing. The proposed SASB metric appears to carry environmental and social dimensions that are not reflected in domestic feed certification frameworks. We recommend the ISSB clarify the intent of this metric and engage with Australian regulators and industry on its applicability. Supplier audits (FB-MP-430c.3). Third-party supplier audits may be feasible for large processors already required to produce a Modern Slavery statement, but the metric is not proportionate or practical for farm-level businesses, for which audit costs would reduce farm profitability without a demonstrated information benefit. We recommend a proportionality mechanism for this metric.
Q2(e) <i>Do you agree that the proposals would improve the international applicability of the Meat, Poultry & Dairy SASB Standard and would lead to the</i>	We acknowledge that the revisions are designed to improve international applicability by removing overly jurisdiction-specific metrics, such as the gestation crate and cage-free egg metrics, and by aligning with globally recognised frameworks including IFRS S2, TNFD and the WHO antimicrobial classification. We support that direction.

Consultation question	Response
<i>disclosure of decision-useful information from entities in the industry regardless of their jurisdiction? Why or why not?</i>	However, several proposed metrics could create challenges for entities operating under existing Australian regulatory and assurance frameworks. In particular: the deforestation-free supply chain metric (FB-MP-430b.1) may conflict with or duplicate obligations under the EUDR, which has itself been delayed due to practical difficulties in agricultural supply chains; the animal feed certification metric (FB-MP-430c.2) is not aligned with current or proposed Australian feed standards, which do not address environmental or social sourcing dimensions; and the antibiotic use metric (FB-MP-260a.1) references WHO classifications where Australian entities would benefit from explicit permission to reference the ASTAG classification system, the domestic standard. We recommend that the ISSB, in developing final guidance, engage with jurisdictional regulators and industry bodies to ensure metrics are consistent with existing domestic frameworks and do not create duplicative or conflicting reporting obligations that add compliance cost without improving sustainability outcomes. , and more generally to adopt flexible drafting that permits preparers to report against an equivalent domestic standard across multiple topics, provided they disclose which standard they are using. We recognise that Australian standard setters and regulators, including the AASB, are likely to give separate consideration to some of these points of alignment as part of any domestic adoption and implementation process, but consider they are best addressed at source in the international text where possible.
Q2(f) <i>Do you agree that the proposed amendments would enhance the Standard's interoperability and alignment with other sustainability-related standards or frameworks? Why or why not?</i>	We broadly agree that the proposed amendments improve interoperability, particularly through alignment with IFRS S2 on GHG and water metrics, TNFD on spatial footprint and nature proximity, and WHO antimicrobial classifications. The consolidation of supply chain topics and the introduction of outcome-based and qualitative strategy metrics also align with the direction of global sustainability reporting. Interoperability could be further enhanced in two areas. First, the deforestation metrics (FB-MP-430b.1 and FB-MP-160a.7) should be drafted for consistency with EUDR requirements so that entities meeting EUDR obligations are not subject to duplicative or conflicting traceability processes under the SASB Standard. Second, the heating value provisions in the energy metrics should be confirmed as accommodating the values required under national regulatory reporting regimes, including Australia's, so preparers are not required to maintain parallel energy conversions across frameworks.
Q2(g) <i>Are there any proposed metrics that would benefit from the inclusion of specific proportionality mechanisms described in paragraphs BC47 to BC48 of the Basis for Conclusions? If so, identify which metrics and explain why.</i>	Yes. Proportionality is essential if the Standard is to be applied across supply chains built on family farm businesses without imposing compliance costs that reduce farm profitability while adding little decision-useful information. We identify the following metrics as particularly in need of proportionality mechanisms. FB-MP-000.D (total hours worked). Not appropriate for farm-level businesses, where the boundary between owner time, family labour, lifestyle and business activity is inherently unclear. A mechanism allowing smaller or family farm entities to substitute outcome-based workforce disclosures would be more appropriate and more meaningful. FB-MP-430b.1 (deforestation-free sourced livestock and feed). The supply chain traceability required is disproportionate for entities that are not direct purchasers of feed ingredients. A tiered approach, for example disclosure based on available data with a phased pathway to full traceability, would improve feasibility without compromising decision-usefulness. FB-MP-430c.1 (labour conditions and human rights due diligence). In the Australian context these obligations are already addressed by regulation for larger entities. A threshold-based mechanism, for example applying only to entities above a specified annual turnover, would keep the metric proportionate while preserving its relevance for larger processors. FB-MP-430c.3 (high-risk supplier audits). Third-party audits are feasible for large processors but not proportionate for farm businesses or smaller supply chain entities. A size or revenue threshold mechanism is recommended.

Consultation question	Response
	FB-MP-140a.2 (water management risks). The breadth of the required risk assessment is significant. A mechanism allowing entities operating predominantly in low water stress regions to provide a simplified disclosure, with full disclosure required in high stress regions, would improve cost-effectiveness without reducing relevance for investors.
Q6 <i>The ISSB proposes to set an effective date for the amendments between 12 and 18 months after their issuance and to permit early application. Do you agree with the proposed approach?</i>	We support permitting early application but 12 to 18 months is not a realistic effective date for adoption of any amendments to this Standard. The new and expanded supply chain metrics would require preparers to build new data systems, engage and support thousands of independent dairy farm suppliers, and establish assurance over information not previously collected. A longer transition, with phased implementation prioritising metrics for which data is already available, would materially improve the quality and comparability of first-time disclosures. We recommend the ISSB undertake further direct engagement with global dairy sector interests, potentially including the Global DSF, in settling a realistic and workable transition timeline.

Appendix B: Metric-level comments, proposed amendments to the Meat, Poultry & Dairy SASB Standard

Comments are provided only for amendments on which the industry has a position; amendments not listed are not opposed. The Status column is an internal working aid and should be deleted, with red italic placeholders resolved, before lodgement.

<i>Metric / topic</i>	<i>Proposed change (summary)</i>	<i>Position and comments</i>
Topic summary <i>Greenhouse Gas Emissions</i>	Revised summary describes direct emissions from raising and producing livestock as a significant portion of global greenhouse gas emissions.	Recommend revision. The framing is misleading without context: livestock emissions represent approximately 12 per cent of global emissions. Consistent with a science-based approach, the summary should contextualise the scale of agricultural emissions accurately rather than characterise them, unqualified, as a significant global contributor.
FB-MP-000.B <i>Activity metrics</i>	Wording changed from percentage outsourced to percentage sourced from third parties; units clarified for animal and product categories.	Supported. The clarification is helpful and consistent with current industry sustainability reporting practices.
FB-MP-000.C <i>Activity metrics</i>	New metric: total number of (1) employees and (2) non-employee workers.	Supported, and consistent with current industry sustainability reporting practices. Given the dairy industry concerns regarding the related hours worked metric, we suggest the ISSB consider an option to voluntarily disaggregate non-employee workers in a way that is meaningful to risk, such as by labour hire or similar engagement category, which would provide investors with additional insight without the practicability issues raised elsewhere in this submission.
FB-MP-000.D <i>Activity metrics</i>	New metric: total hours worked disaggregated by (1) employees and (2) non-employee workers.	Not supported. Hours worked is not a meaningful measure in on-farm contexts: on dairy family farms there is no clear boundary between owner time, family labour, lifestyle and business activity, and formalising hours-based reporting risks pressuring farmers or discouraging employees from working hours they choose. Recommend outcome-based workforce measures instead (appropriate compensation for hours worked, satisfaction with working arrangements, safety outcomes), consistent with an outcome-focused standard. See also Q2(g) on proportionality.
FB-MP-110a.1 <i>Greenhouse Gas Emissions</i>	Scope 1 disclosure retained; protocol aligned with IFRS S2 paragraph 29(a); methane percentage tied to enteric fermentation and manure management.	Alignment with IFRS S2 is supported and consistent with current industry sustainability reporting practices. . We query the decision-usefulness of a percentage methane figure for processors, whose Scope 1 emissions are typically dominated by carbon dioxide from fuel combustion rather than methane; guidance on interpretation would assist.
FB-MP-110a.2 <i>Greenhouse Gas Emissions</i>	Metric renamed to description of Scope 1 GHG emissions targets; protocol restructured per IFRS S2 paragraphs 33 to 36.	Supported in principle, consistency with current industry sustainability reporting practices

<i>Metric / topic</i>	<i>Proposed change (summary)</i>	<i>Position and comments</i>
FB-MP-130a.1 <i>Energy Management</i>	Total energy consumed retained; purchased electricity reported as a quantity; renewable electricity disaggregated by self-generation and direct contracts; energy calculated using lower heating values by default with a jurisdictional carve-out; biomass renewable energy must be certified to a third-party standard, with previously named acceptable standards removed.	Seek confirmation that the heating value carve-out accommodates values required under Australian regulatory reporting, so preparers need not maintain parallel conversions, with transition guidance given effects on comparability. Disaggregation requirements appear workable but should be tested. Seek clarity on whether self-generated, self-consumed renewable energy (for example biogas from effluent) can be counted where the feedstock itself is not subject to third party certification, and whether schemes such as GreenPower Renewable Gas Certification or the Commonwealth Guarantee of Origin scheme qualify, noting the amended protocol no longer names acceptable certification standards.
FB-MP-140a.1 <i>Water Management</i>	Water withdrawal disaggregated by source; consumption definition expanded to include water used in crop production or consumed by humans and livestock; water-stressed location percentages split for withdrawal and consumption.	Support disaggregated withdrawal reporting. The expanded consumption definition appears impractical and potentially infeasible, particularly reporting water consumed by humans and livestock and crop water use outside irrigated systems. Recommend the ISSB clarify the definition of direct operations and test the consumption definition with preparers, including whether entities already map sites against recognised water stress tools.
FB-MP-140a.2 <i>Water Management</i>	Expanded to require description of water-related risks and opportunities, anticipated financial impacts, and targets per IFRS S1 paragraphs 51 to 53.	The breadth of the required assessment (drought, floods, seasonal variability, water quality, price volatility, stakeholder perceptions, competition for water, regulatory compliance) is a substantial burden whose cost should be proportionate to its decision-usefulness. The protocol also requires description of forward-looking risks to obtaining or retaining discharge permits; many preparers manage permit compliance operationally rather than through a documented forward risk view, and public disclosure of permit retention risk raises sensitivity concerns that should be considered. Recommend proportionality guidance and clarification of whether the assessment is limited to direct operations. Disclosure of legally required targets is likely workable as data will be readily available.
FB-MP-140a.3 <i>Water Management</i>	Removed: number of incidents of non-compliance with water quality permits, standards and regulations.	Removal supported.
FB-MP-140a.4 <i>Water Management</i>	New metric: total water discharged by (1) destination and (2) level of treatment.	Should be tested with preparers as data availability is unclear. Two clarifications sought: the destination category for effluent dispersed to land, which is treated as a discharge but has no listed destination; and whether entities pre-treating trade waste on site report their own treatment level or the full chain including the utility's downstream treatment.
FB-MP-160a.1 / 160a.2 <i>Land Use & Ecological Impacts</i>	Removed: litter and manure nutrient management metric; pasture and grazing land conservation plan metric. Replaced by more granular metrics.	Removals supported. The replacement nutrient management plan metrics (FB-MP-160a.9 and FB-MP-430b.3) are a more practical construction.
FB-MP-160a.4 <i>Land Use & Ecological Impacts</i>	CAFO metric renumbered from FB-MP-160a.3: percentage of animal protein production from confined animal feeding operations (own operations).	Of concern; a key submission point. Most dairy farms will not be directly captured (the metric applies to owned and operated facilities), but the disclosure risks characterising barn systems as unsustainable without context for their biosecurity, resource efficiency and welfare benefits, and

<i>Metric / topic</i>	<i>Proposed change (summary)</i>	<i>Position and comments</i>
		uncontextualized percentages are exposed to misuse in procurement and market access settings. Recommend a clear CAFO definition and mandatory contextual guidance; consider differentiating well-managed barn systems.
FB-MP-160a.5 <i>Land Use & Ecological Impacts</i>	New metric: total spatial footprint of operations, area disturbed and area restored, covering land the entity leases, manages or owns.	The topic states its metrics are intended to capture direct livestock operations, yet this metric refers to any property the entity leases, manages or owns, which reads more broadly. This creates a threshold question for dairy manufacturers that source milk and run no farms: it is unclear whether the topic applies to them at all, and whether land owned but leased out (for example to a farming operator) falls within the entity's footprint or the operator's. Recommend the ISSB define direct livestock operations, reconcile it with the boundary terms used in the water metrics, and define original reference state for disturbance reporting, since feasibility depends on how far back land use change must be traced.
FB-MP-160a.6 <i>Land Use & Ecological Impacts</i>	New metric: percentage of total spatial footprint in or within 5 km of an environmentally sensitive location, defined by reference to international datasets (IUCN protected areas, Ramsar wetlands, World Heritage areas, Key Biodiversity Areas, IUCN Red List habitat).	Two concerns. First, the international datasets do not map neatly to the Australian frameworks preparers already screen against (EPBC listings, state reserves, the Directory of Important Wetlands); the protocol should clarify which applies and permit equivalent national frameworks. Second, for a processing plant, proximity within 5 km is not a meaningful signal of impact on its own without context such as discharge pathways; recommend the ISSB reconsider the indicator or allow contextualisation. The topic-level scope question raised under FB-MP-160a.5 applies equally here.
FB-MP-160a.7 <i>Land Use & Ecological Impacts</i>	New metric: percentage of livestock produced from direct farming operations determined to be deforestation- or conversion-free, including targets.	Recommend the ISSB clarify the definition of direct farming operations and how it differs from operations elsewhere in the topic. There is likely overlap with EUDR reporting; the SASB requirement should be consistent with the EUDR so entities do not face duplicative or conflicting obligations.
FB-MP-160a.8 <i>Land Use & Ecological Impacts</i>	New qualitative metric: priority products from direct farming operations sensitive to nature- and climate-related physical risks.	Accepted, subject to clarification of the definition of direct farming operations.
FB-MP-160a.9 <i>Land Use & Ecological Impacts</i>	New metric: percentage of livestock production from direct farming operations implementing a written nutrient management plan.	Acceptable, subject to clarification of direct farming operations. Applicability is expected to be limited, as few reporting entities in dairy will have significant direct farming operations.
FB-MP-250a.3 <i>Food Safety</i>	Recall disclosure changed from description to number of recalls; note on notable recalls retained.	Supported; aligned with existing practice.
FB-MP-250a.4 <i>Food Safety</i>	Minor wording change: information about markets that restrict, ban or suspend imports clarified to discussion of such markets.	We seek clarity on what this qualitative disclosure is intended to achieve for primary users, and whether the expectation is to explain the nature of the restriction so that recurrence risk can be assessed. As drafted, the decision-usefulness is unclear.

<i>Metric / topic</i>	<i>Proposed change (summary)</i>	<i>Position and comments</i>
FB-MP-250a.5 <i>Food Safety</i>	New metric: percentage of production volume from sites certified to internationally recognised food safety standards, for own operations and co-packing.	We question the food safety or investor benefit this metric delivers and seek clarity on which standards qualify. Australian dairy already operates under mature regulated, audited food safety systems; the protocol should recognise equivalent national systems so the metric leverages rather than duplicates them.
FB-MP-250a.6 <i>Food Safety</i>	New qualitative metric: processes, controls and procedures to ensure food safety throughout the value chain.	Potentially significant reporting requirements for dairy manufacturers and farmers with unclear incremental benefit. Recommend the ISSB clarify the expected level of detail and confirm that reference to an existing audited food safety plan satisfies the requirement.
FB-MP-260a.1 <i>Antibiotic Use in Animal Production</i>	Terminology updated; protocol aligned with the WHO list of medically important antimicrobials.	Support transparency on antimicrobial stewardship on a science-based footing. Two concerns: real-time tracking of antibiotic use at farm level may not be feasible in current systems; and the definition of medically important should explicitly permit reference to the ASTAG classification, which underpins Australian regulation and practice. Recommend the ISSB clarify the governing classification and allow equivalent national frameworks.
FB-MP-320a.1 <i>Workforce Health & Safety</i>	Contract employees replaced with non-employee workers; TRIR listed first; training hours retained.	Terminology alignment with IFRS S1 is supported. We note the ADSF reports Lost Time Injury Frequency Rate (LTIFR) against a goal of zero workplace fatalities on farm and in manufacturing; TRIR and LTIFR are both lagging indicators with different scopes. Recommend the ISSB provide guidance on the relationship between TRIR and other established indicators to support comparability for preparers transitioning between frameworks.
FB-MP-410a.1 / 410a.2 <i>Animal Health & Welfare</i>	Removed: gestation crate and cage-free egg metrics.	Removals supported. These metrics were jurisdiction- and product-specific; their removal improves international applicability.
FB-MP-410a.3 <i>Animal Health & Welfare</i>	Retained: percentage of production certified to a third-party animal welfare standard.	Supported. We support retention of this metric. However, we recommend broadening the wording to recognise participation in credible national animal assurance and regulatory assurance schemes, in addition to third-party certification programs. In some jurisdictions, robust animal welfare outcomes are achieved through nationally recognised assurance frameworks and regulatory oversight, and reliance solely on third-party certification may not fully reflect industry practices or outcomes. Recognising both approaches would provide a more complete and balanced representation of animal welfare performance while avoiding an unintended preference for third-party certification.
FB-MP-410a.4 / 410a.5 <i>Animal Health & Welfare</i>	New qualitative metrics: animal welfare strategy (including targets and value chain integration) and biosecurity risks and disease management strategies.	Supported. Consistent with current, science-based industry sustainability reporting practices, , and the explicit recognition of biosecurity reflects a genuine sustainability risk and an established strength of Australian systems.
FB-MP-430b.1 <i>Environmental Supply Chain Management</i>	New metric: percentages of sourced (1) livestock and (2) animal feed determined to be deforestation- or conversion-free, by live weight, including targets.	One of the most challenging metrics in the revised standard, and one drafted around a meat supply chain. The unit does not fit dairy: sourced livestock measured by live weight has no clear meaning for a dairy manufacturer sourcing milk, where the animal is retained in production

<i>Metric / topic</i>	<i>Proposed change (summary)</i>	<i>Position and comments</i>
		rather than traded, and the ISSB should establish how the metric is to be read for dairy. Tracing the deforestation status of feed, including palm kernel expeller and soy purchased by farms or feed mills through intermediaries rather than by the processor, will be extremely difficult. The metric also misses the manufacturing inputs that carry recognised deforestation risk, such as palm oil, cocoa, sugar and soy lecithin, which for value-added dairy products may be the entity's largest exposure; the Agricultural Products equivalent covers sourced agricultural products generally, so this gap appears unintended and should be addressed. Requirements should be consistent with the EUDR, whose implementation has itself been delayed over feasibility in agricultural supply chains, and must not create additional or conflicting obligations. A phased, data-availability-based pathway would be more workable (see Q2(g)). This difficulty is not merely theoretical: the current industry work examining the feasibility of proposed deforestation reporting has found that the actual extent of deforestation or land conversion associated with imported feed commodities used by the sector is not currently known or quantified, notwithstanding preliminary work to characterise likely countries of origin for imported palm kernel expeller and soybean meal. We also note that global dairy processors and major Australian retail customers have increasingly extended "no deforestation" or "deforestation-free" commitments to cover feed as well as directly sourced commodities, with target dates generally set for 2025 or later; this trend is relevant context for the ISSB in calibrating both the scope and the timing of this metric.
FB-MP-430b.2 <i>Environmental Supply Chain Management</i>	New qualitative metric: priority sourced livestock and feed sensitive to nature- and climate-related physical risks.	Acceptable in principle, but gathering supply chain information on feed and livestock risk exposure may be difficult or impractical; recommend the protocol allow reasonable, available-information-based disclosure.
FB-MP-430b.3 <i>Environmental Supply Chain Management</i>	New metric: percentage of sourced livestock from farms implementing a written nutrient management plan.	Should be acceptable, subject to testing with preparers on data collection through the supply chain.
FB-MP-430b.4 <i>Environmental Supply Chain Management</i>	New metric: percentage of animal protein sourced from confined animal feeding operations.	Of significant concern. Reporting is likely feasible, but disclosing the percentage of supply from barn-housed systems, defined as feeding practices in densely populated or limited spaces requiring chemical inputs, risks framing such systems negatively without acknowledging their sustainability benefits, and is exposed to misuse as a procurement or market access screen. Recommend excluding or differentiating well-managed barn systems, or at minimum mandatory contextualisation guidance and a clearer definition.
FB-MP-430c.1 <i>Social Supply Chain Management</i>	New qualitative metric: processes, controls and procedures for managing labour conditions and impacts on local communities in the supply chain, including human rights due diligence.	Human rights risks in the supply chain were not identified as material in the Australian dairy sector's 2024 materiality assessment, and Australia already has Modern Slavery legislation, employment law, work health and safety law and industrial relations law, with Modern Slavery statements required of entities with turnover above \$100 million. Additional reporting should be

<i>Metric / topic</i>	<i>Proposed change (summary)</i>	<i>Position and comments</i>
		required only where it demonstrably improves outcomes. Recommend a turnover or scale threshold proportionality mechanism.
FB-MP-430c.2 <i>Social Supply Chain Management</i>	New metric: percentage of sourced animal feed certified to internationally recognised standards that trace products through the supply chain (by cost).	Australian feed standards are state-based and not nationally harmonised. The SAFEMEAT draft national feed standard (2025) is not finalised or legislated and focuses on food safety of the final product, not environmental or social sourcing. The metric's apparent environmental and social dimensions are not reflected in domestic certification frameworks. Recommend the ISSB clarify the metric's intent and engage with Australian regulators and industry on applicability.
FB-MP-430c.3 <i>Social Supply Chain Management</i>	New metric: percentage of high-risk suppliers subject to independent third-party audit or verification in the previous three years.	Feasible for large dairy manufacturers already producing Modern Slavery statements, but not proportionate or practical for dairy farm-level businesses, for which audit costs would erode profitability without demonstrated benefit. Recommend a size or revenue threshold proportionality mechanism.